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GLOSSARY OF TERMS

APPENDIX A. PROGRESSION OF SEAWATER INTRUSION BENEATH THE SOUTH OXNARD PLAIN

Although seawater intrusion under the Oxnard Plain has been studied over several decades, the details of the intrusion have not been analyzed until recently when United Water Conservation District (UWCD) entered all historic data on water levels, water quality, and well construction into digital databases and GIS coverages so the entire data set could be analyzed systematically. This new analysis uses all this digital information to construct a series of maps depicting groundwater levels and chloride concentrations in wells within the south Oxnard Plain from as far back as 1920. The analysis used 5-year time slices in both the Lower Aquifer System and Upper Aquifer System to determine when groundwater levels first dropped below sea level, when chloride levels first increased as a result of the landward gradient caused by these lowered groundwater levels, and the progression of saline water since that time.

Groundwater levels first dropped below sea level in the period 1945-49 in the Upper Aquifer System (Figure 26), although groundwater levels were scarce at the coastline for some years prior to that time. In the following 5-year time slice of 1950-54 (Figure 27), groundwater levels dropped below sea level across much of the south Oxnard Plain, and chlorides increased to as much as 1,925 mg/L at the Port Hueneme coastline. Thus, the apparent time lag between groundwater dropping below sea level and the encroachment of seawater was somewhere in the range of 5 to 10 years. In the following 5-year time slice of 1955-59, chlorides increased rapidly in coastal wells, reaching as high as 27,350 mg/L (Figure 28).

Although a few sampled wells may have had corroded casings that allowed poorer-quality perched water to flow into the well, most of the early chloride readings were taken from pumping wells with a smaller chance of significant cross-contamination during sampling (groundwater flowing into pumping wells would likely come mostly from screened intervals in the well). Outliers of wells with poorer quality water were not considered in the interpretation of the areas of saline intrusion to minimize random instances of cross-contamination; it was only concentrations of wells with poor quality water that were considered as significant. Within the first 20 years of intrusion, higher chloride levels were evident up to 3 miles inland from the area of initial intrusion, an intrusion rate of about 800 feet per year. This rate of intrusion is similar to rates calculated for seawater intrusion in the Salinas groundwater basin (Kennedy Jenks, 200X).

The intrusion of the Upper Aquifer System in the Port Hueneme area was temporarily arrested during the mid 1980s following a wet climatic cycle (e.g., Figure 34). As the new FCGMA policies, the Freeman Diversion, and the PTP Pipeline came online, chloride levels in the Port Hueneme saline lobe in the Upper Aquifer System continued to decrease, with chloride concentrations in some wells near the coastline returning to drinking-water quality. However, chloride levels remain high in smaller lobes centered

around both Port Hueneme Harbor and Mugu Lagoon (Figure 36). Unfortunately, some of the saline water intruded around Port Hueneme did not exit via the canyon when high water levels return. Unquantified amounts of saline water were transported to the southeast along the coast by the prevailing (non-drought period) groundwater gradient.

Intrusion in the Lower Aquifer System lagged considerably in time behind the Upper Aquifer System. Groundwater levels near the coastline first went below sea level in the 1955-59 time period (Figure 40), but high chlorides were not detected until the 1985-89 time period at Port Hueneme and the 1990-94 time period near Point Mugu (Figure 44, Figure 45), some 30 years later. This time lag is partially caused by the longer travel time for seawater intruded from the Lower Aquifer System outcrops along the offshore Hueneme Submarine Canyon walls and partially the result of the lack of monitoring points right at the coastline until the USGS monitoring wells were drilled in the late 1980s and early 1990s. As discussed in the section *Water Quality Issues*, the U.S. Geological Survey interpretation is that the majority of the saline intrusion in the Lower Aquifer System near Point Mugu is saline water being pulled from surrounding sediments rather than from the ocean itself (see Figure 48).

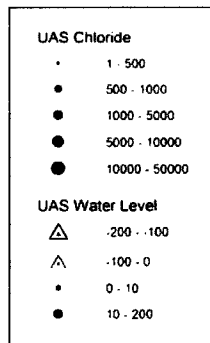


Figure 21. Legend for Figure 22 to Figure 36 for Upper Aquifer System time slices.

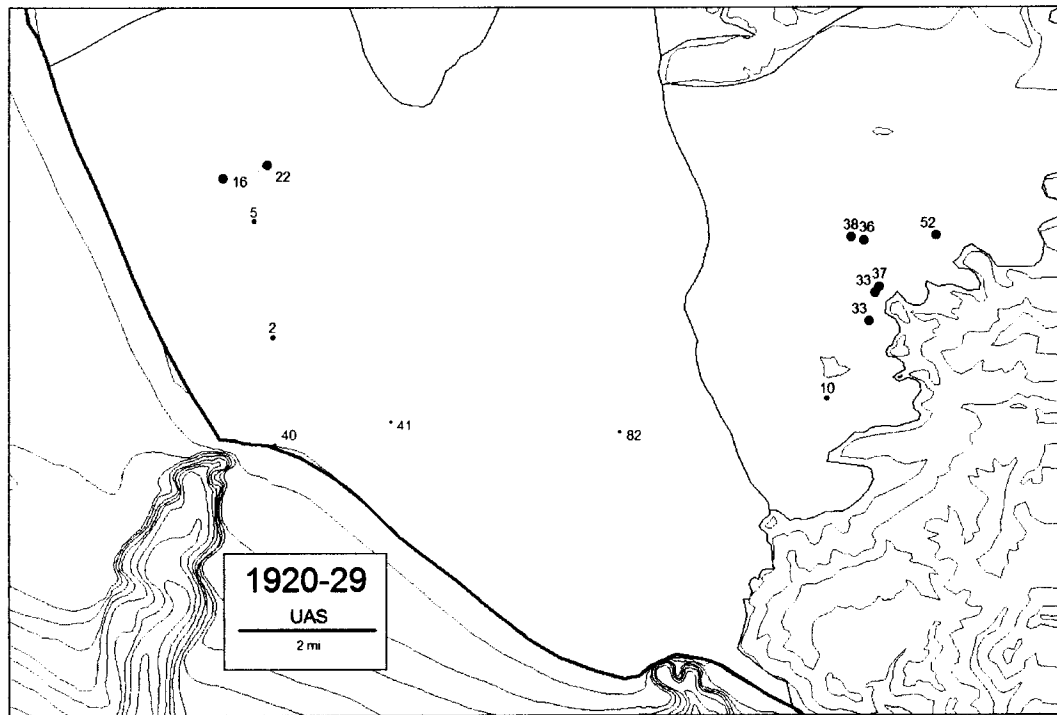


Figure 22. Upper Aquifer System groundwater levels and chloride levels, 1920 to 1929. Legend is shown in Figure 21.

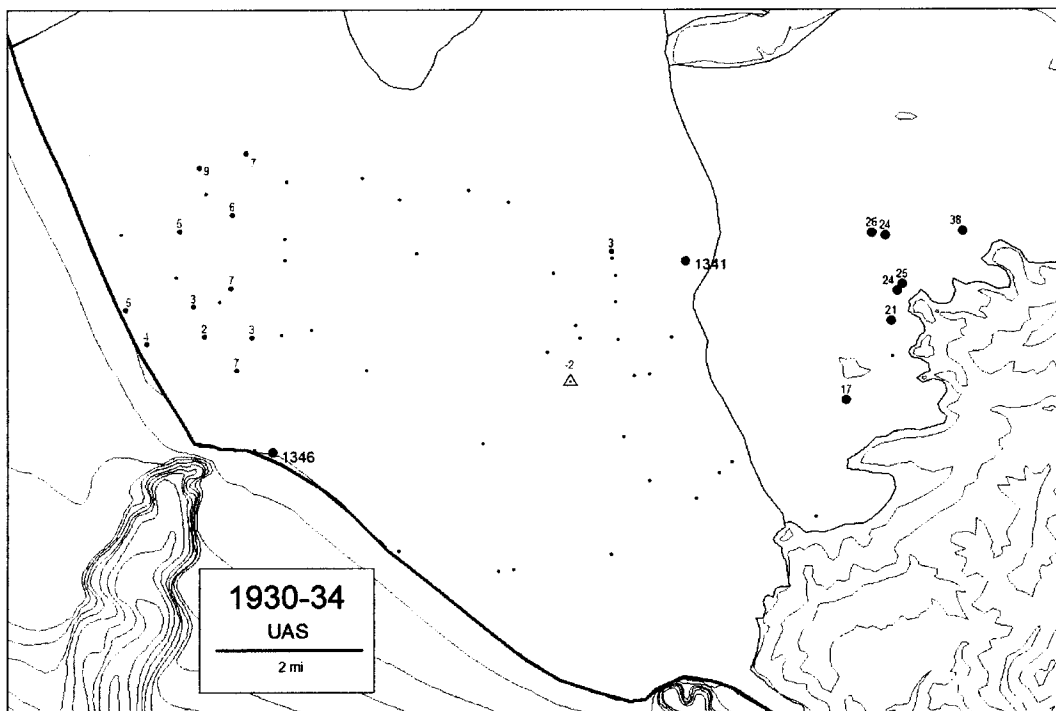


Figure 23. Upper Aquifer System groundwater levels and chloride levels, 1930 to 1934. Legend is shown in Figure 21.

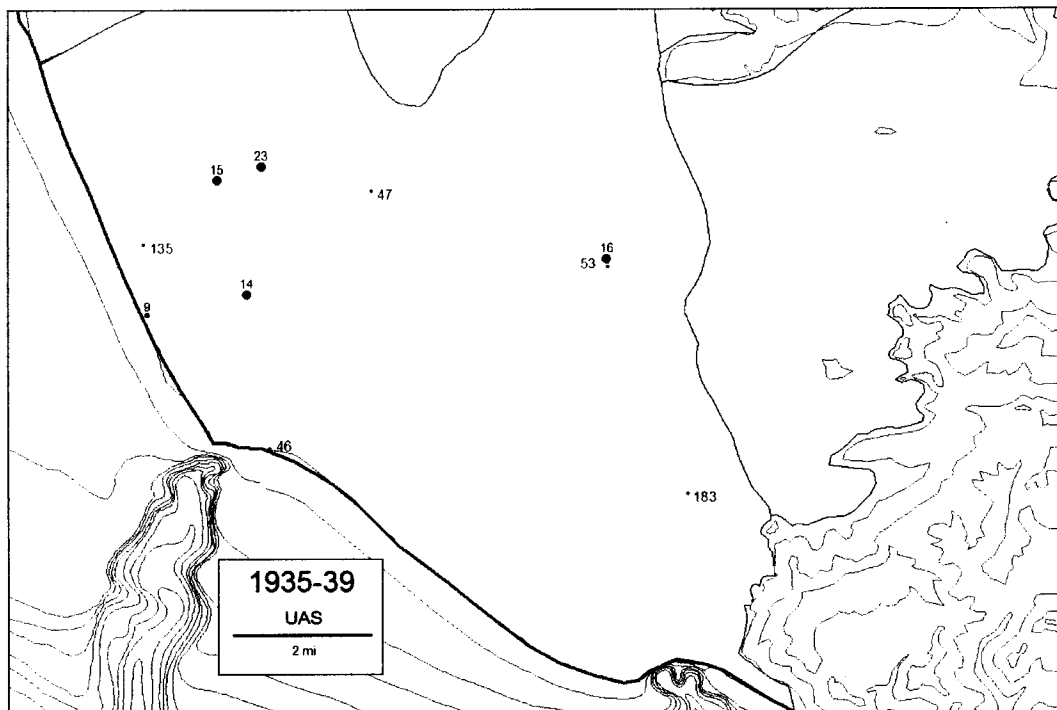


Figure 24. Upper Aquifer System groundwater levels and chloride levels, 1935 to 1939. Legend is shown in Figure 21.

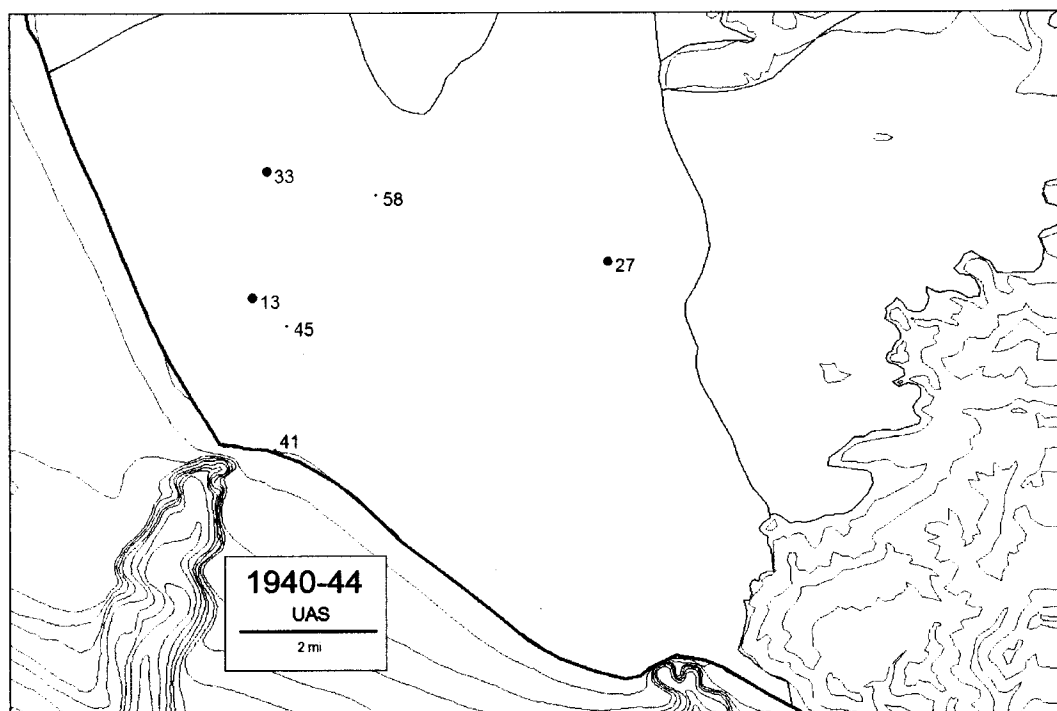


Figure 25. Upper Aquifer System groundwater levels and chloride levels, 1940 to 1944. Legend is shown in Figure 21.

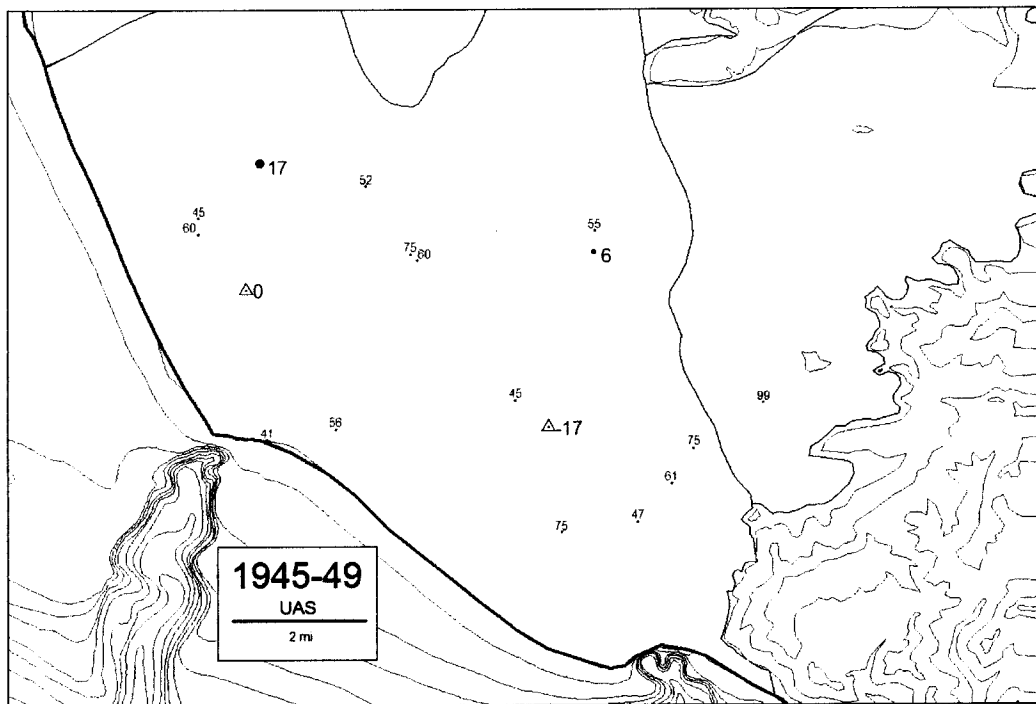


Figure 26. Upper Aquifer System groundwater levels and chloride levels, 1945 to 1949. Legend is shown in Figure 21.

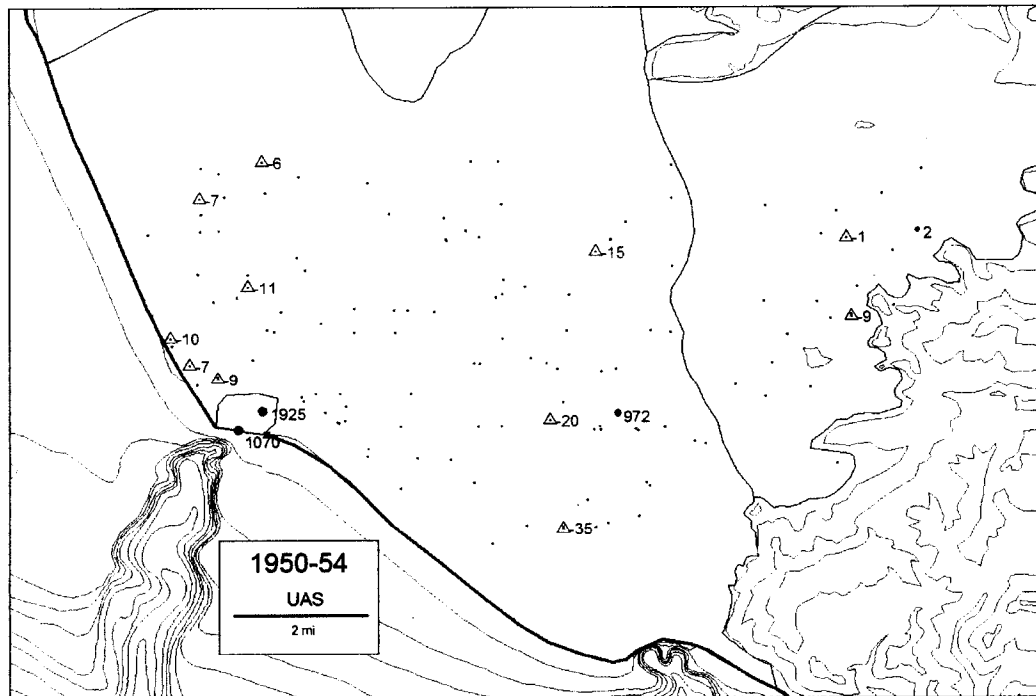


Figure 27. Upper Aquifer System groundwater levels and chloride levels, 1950 to 1954. Legend is shown in Figure 21. Bright yellow area is intruded by seawater near Hueneme Submarine Canyon.

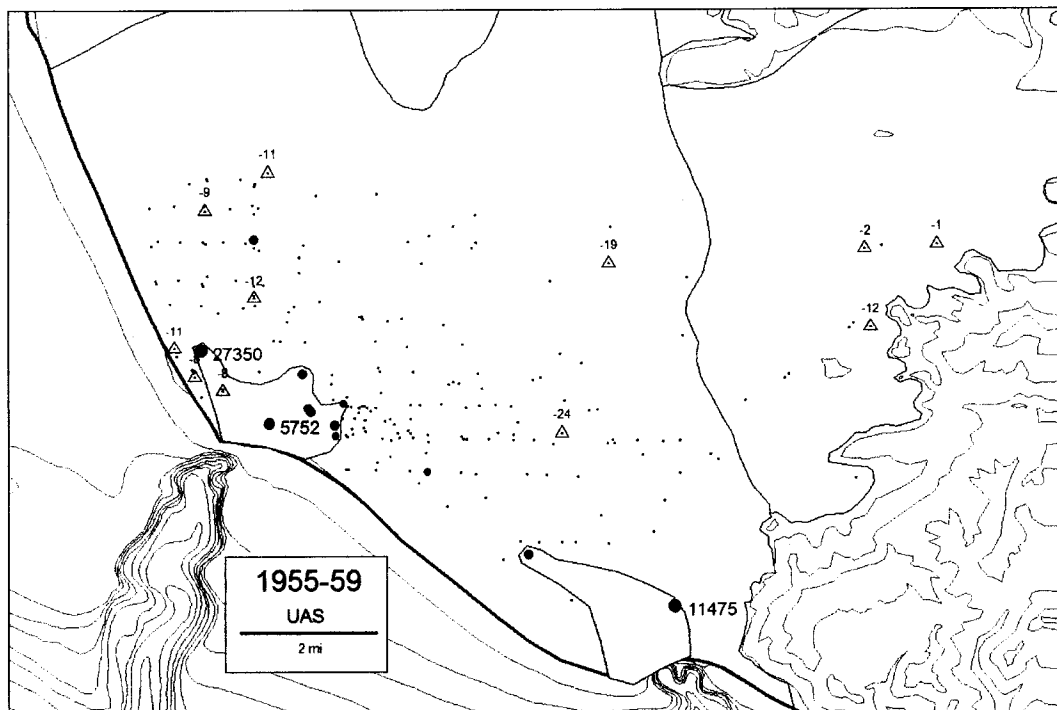


Figure 28. Upper Aquifer System groundwater levels and chloride levels, 1955 to 1959. Legend is shown in Figure 21. Bright yellow areas are intruded by saline waters.

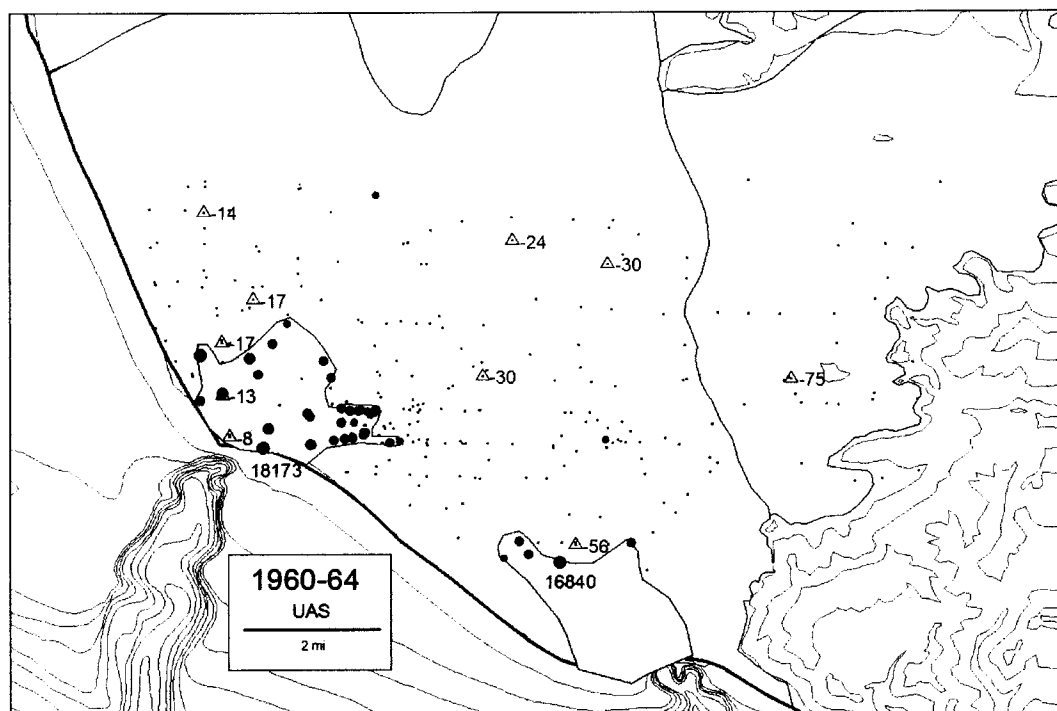


Figure 29. Upper Aquifer System groundwater levels and chloride levels, 1960 to 1964. Legend is shown in Figure 21. Bright yellow areas are intruded by saline waters.

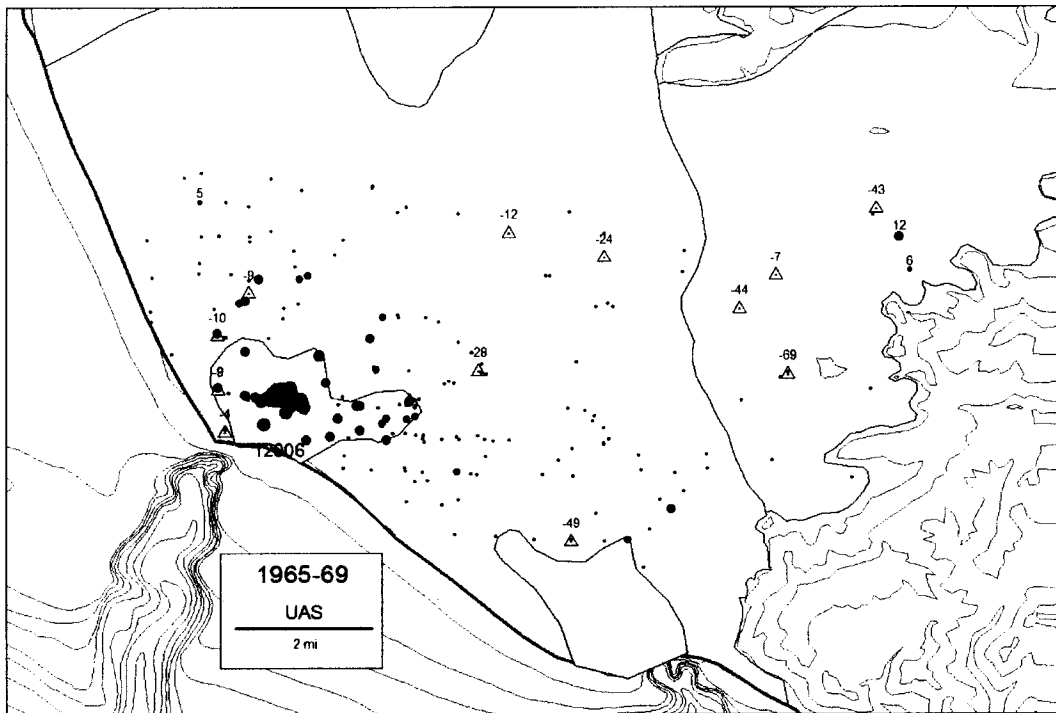


Figure 30. Upper Aquifer System groundwater levels and chloride levels, 1965 to 1969. Legend is shown in Figure 21. Bright yellow areas are intruded by saline waters.

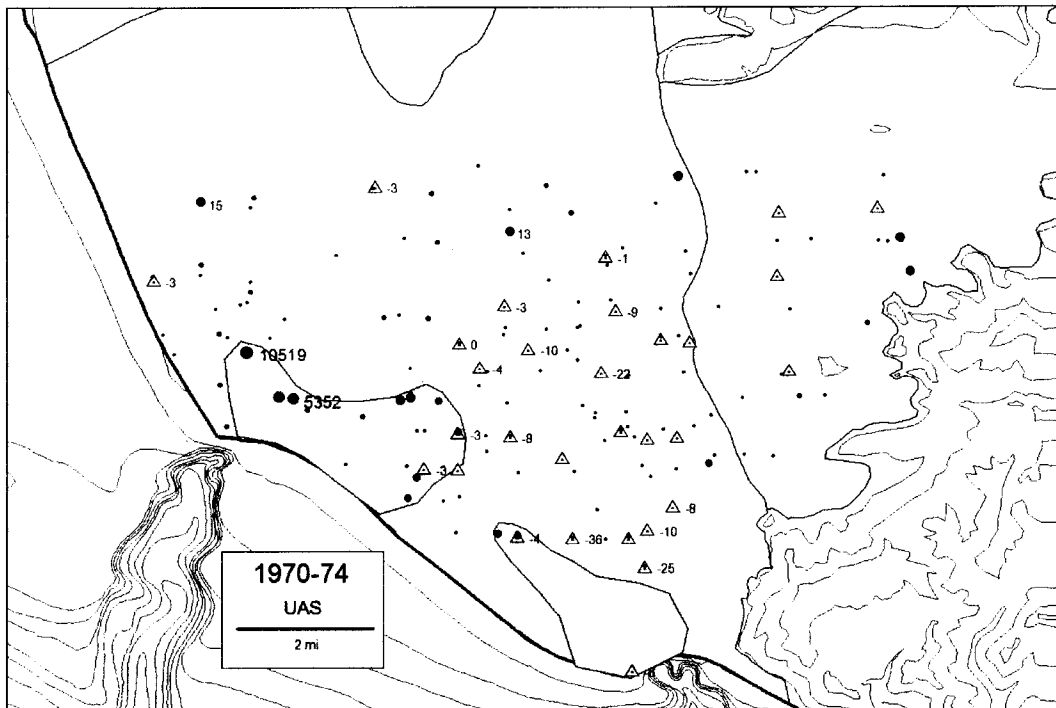


Figure 31. Upper Aquifer System groundwater levels and chloride levels, 1970 to 1974. Legend is shown in Figure 21. Bright yellow areas are intruded by saline waters.

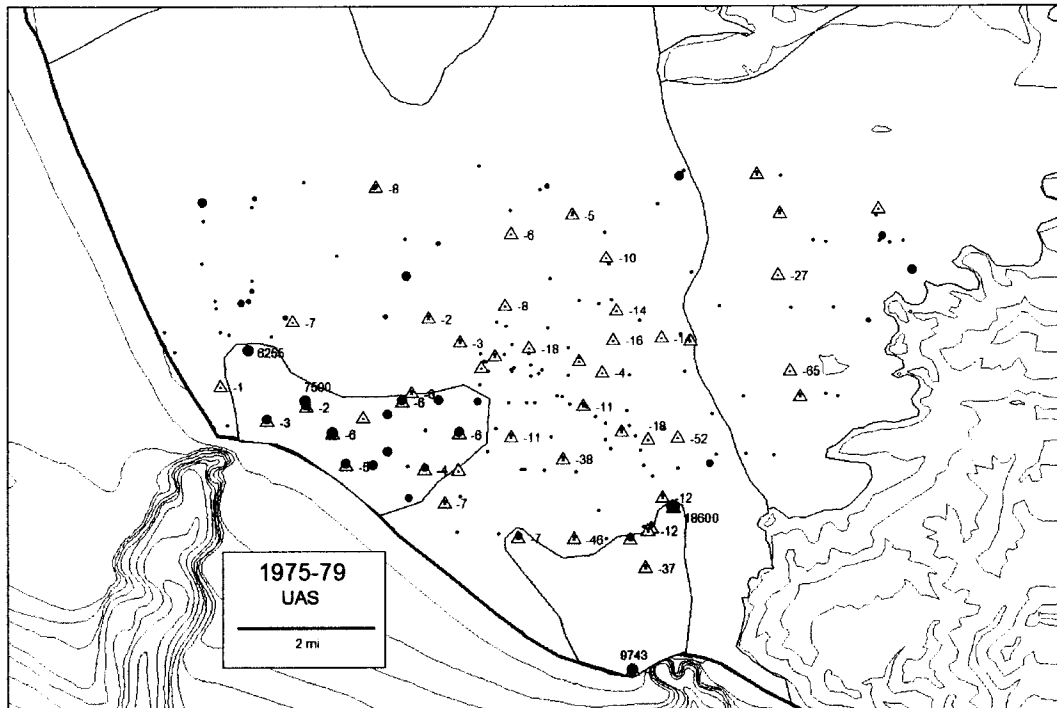


Figure 32. Upper Aquifer System groundwater levels and chloride levels, 1975 to 1979. Legend is shown in Figure 21. Bright yellow areas are intruded by saline waters.

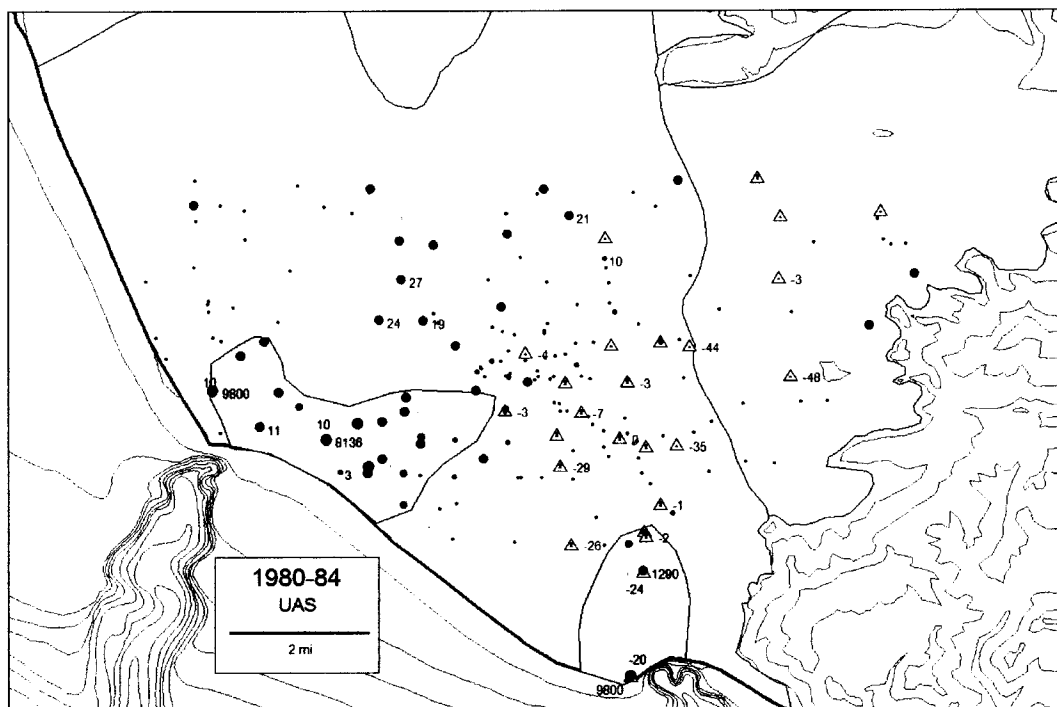


Figure 33. Upper Aquifer System groundwater levels and chloride levels, 1980 to 1984. Legend is shown in Figure 21. Bright yellow areas are intruded by saline waters.

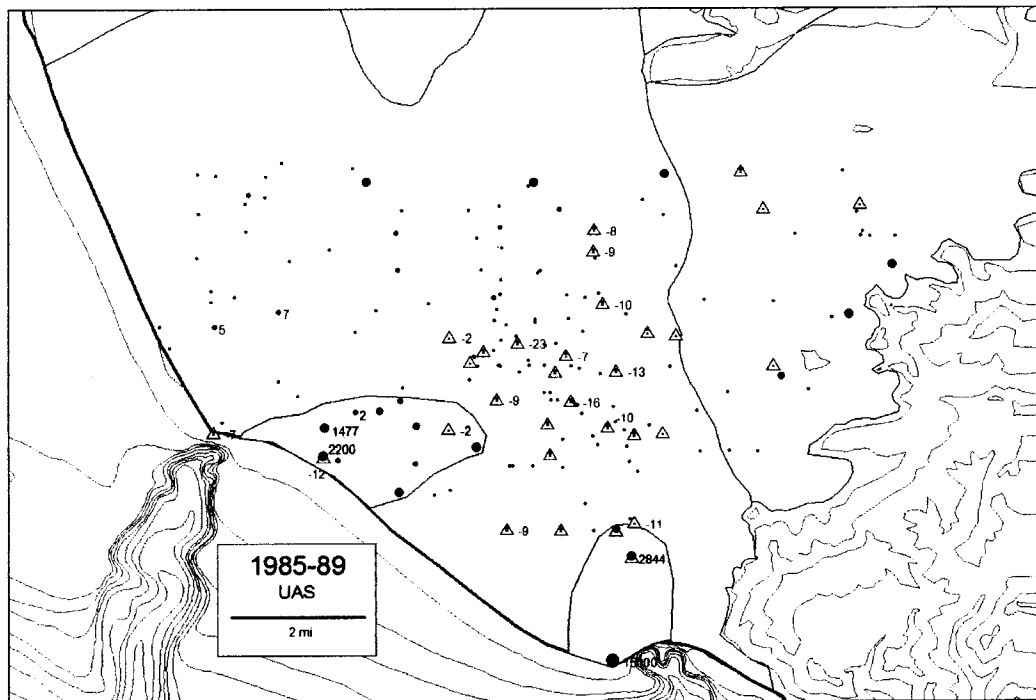


Figure 34. Upper Aquifer System groundwater levels and chloride levels, 1985 to 1989. Legend is shown in Figure 21. Bright yellow areas are intruded by saline waters.

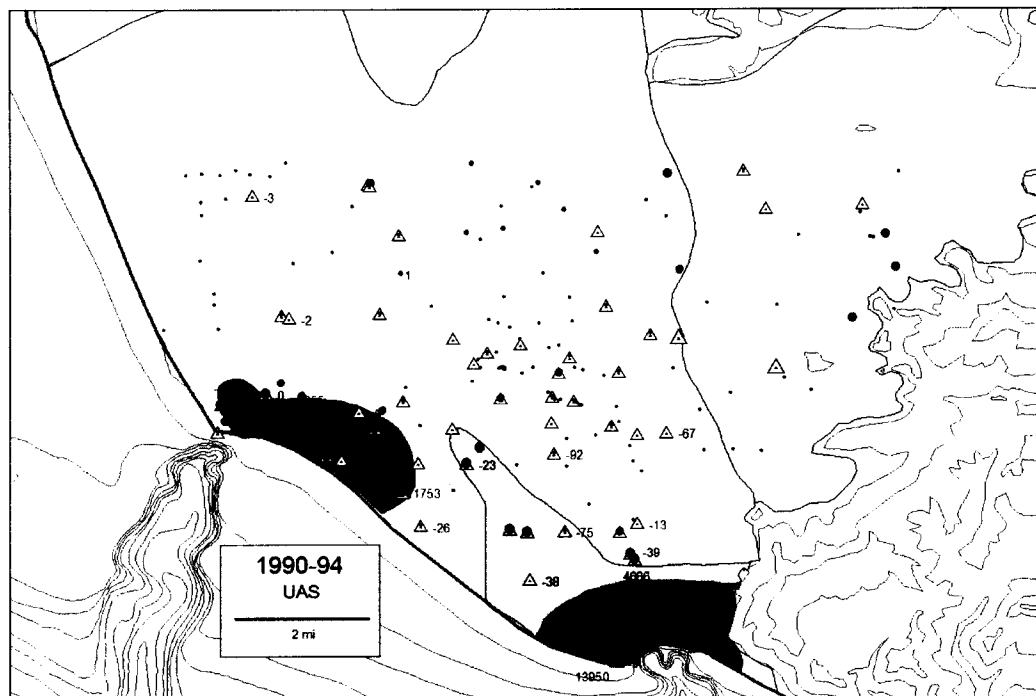


Figure 35. Upper Aquifer System groundwater levels and chloride levels, 1990 to 1994. Legend is shown in Figure 21. Source of saline intruded areas: reddish brown is from seawater; yellow-orange is from sediments.

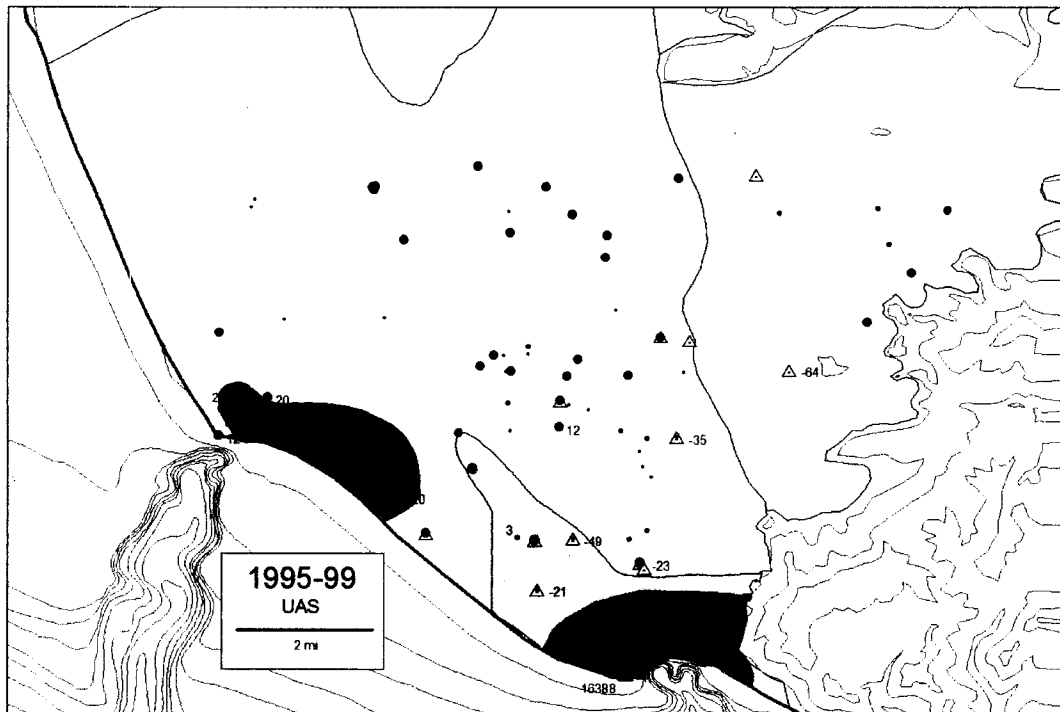


Figure 36 Upper Aquifer System groundwater levels and chloride levels, 1995 to 1999. Legend is shown in Figure 21. Source of saline intruded areas: reddish brown is from seawater; yellow-orange is from sediments.

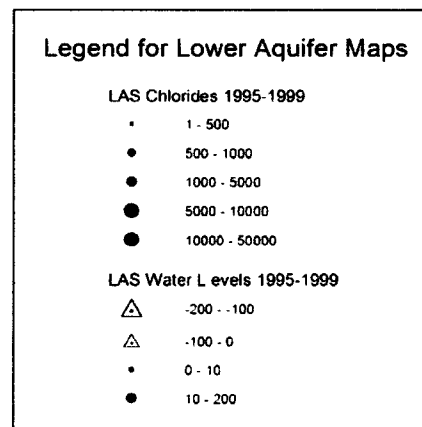


Figure 37. Legend for Figure 38 to Figure 48 for Lower Aquifer System time slices.

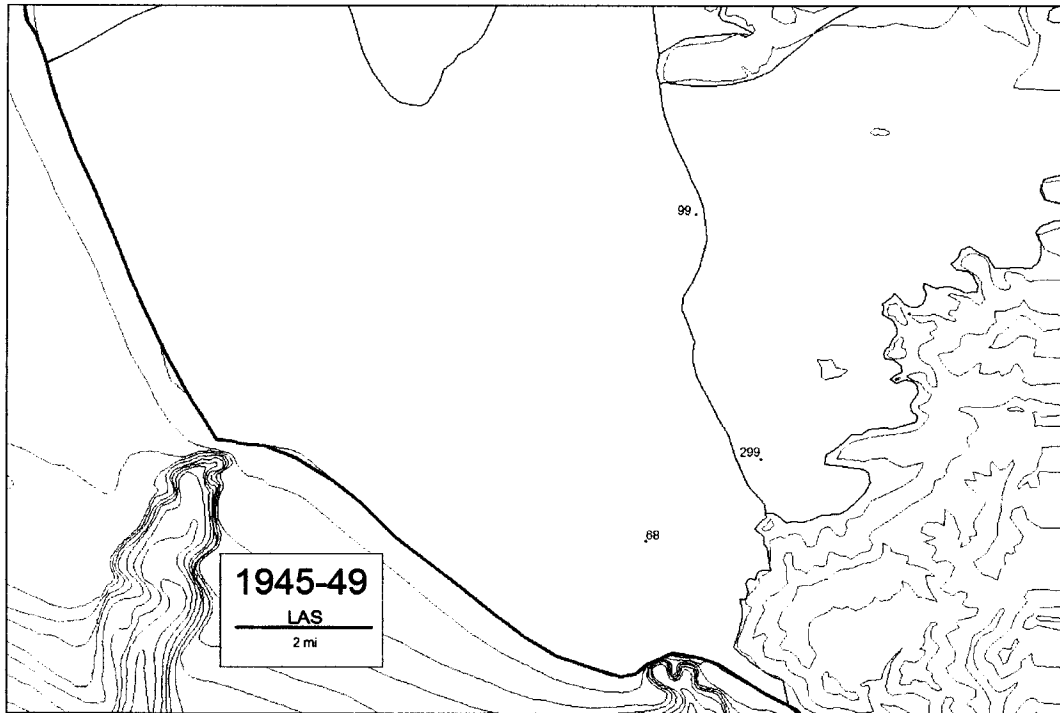


Figure 38. Lower Aquifer System groundwater levels and chloride levels, 1945 to 1949. Legend is shown in Figure 37.

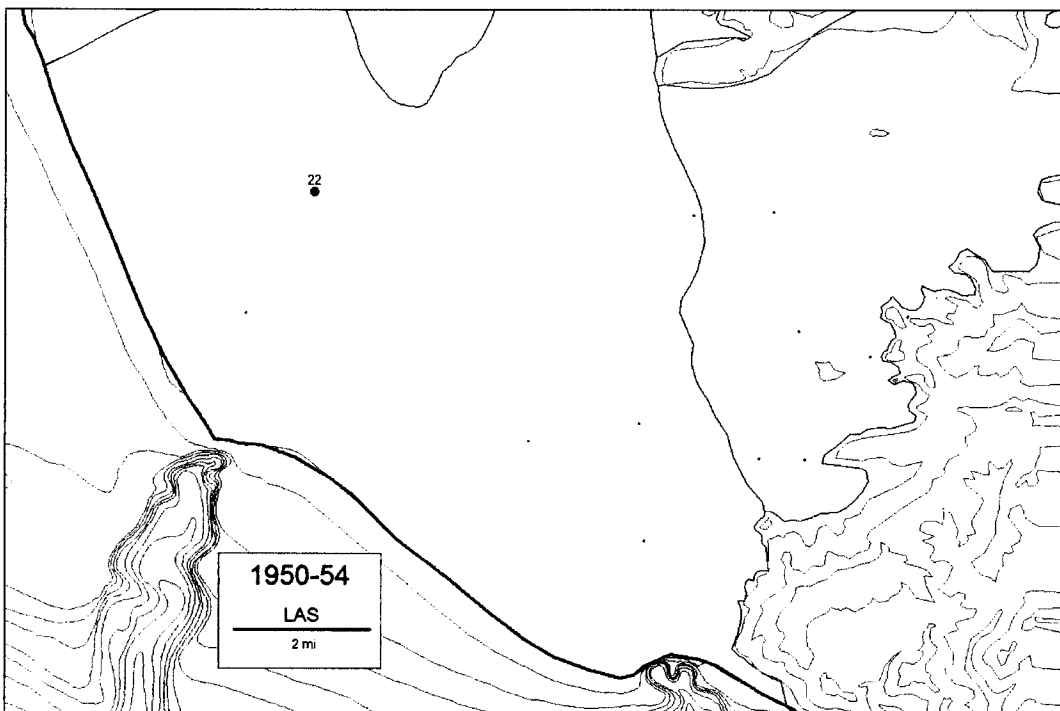


Figure 39. Lower Aquifer System groundwater levels and chloride levels, 1950 to 1954. Legend is shown in Figure 37.

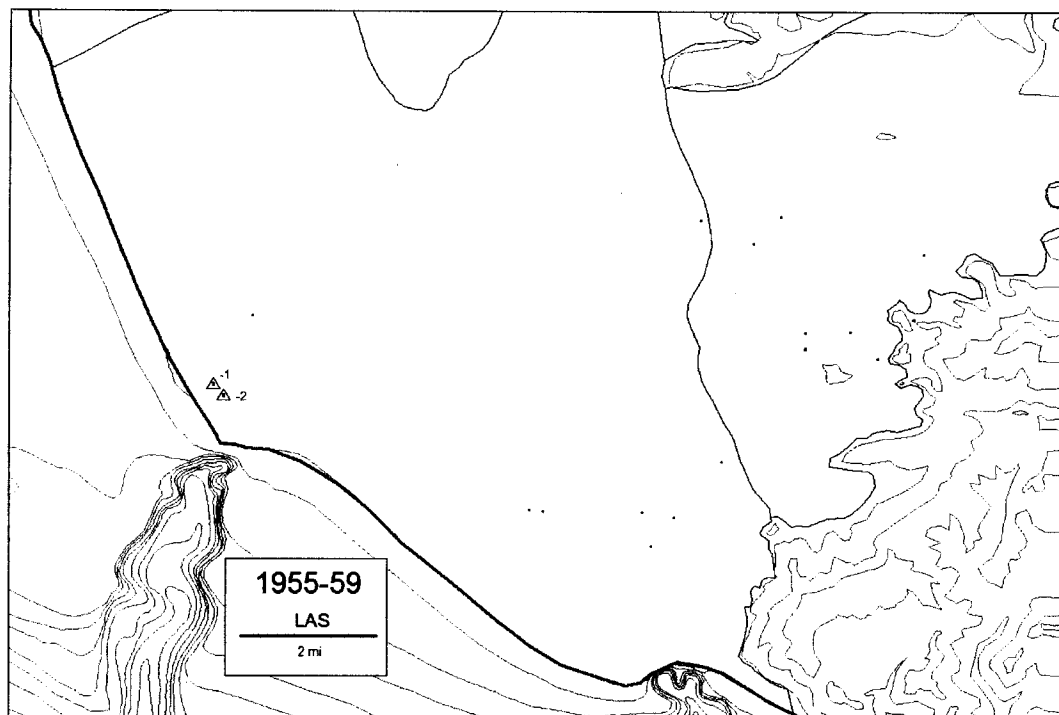


Figure 40. Lower Aquifer System groundwater levels and chloride levels, 1955 to 1959. Legend is shown in Figure 37.

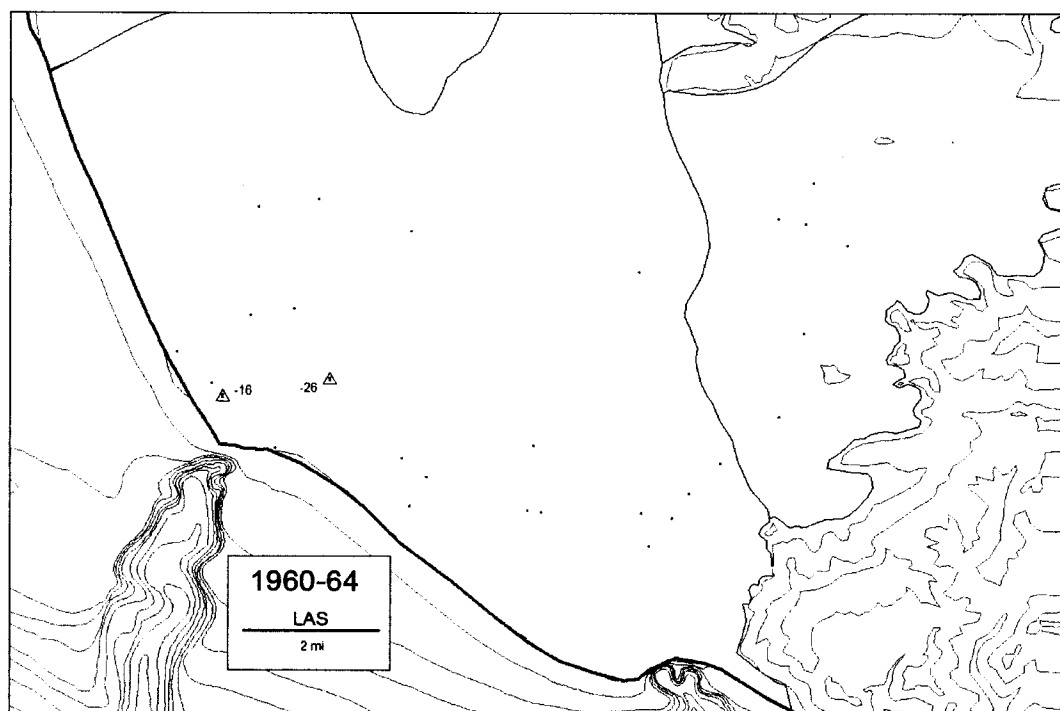


Figure 41. Lower Aquifer System groundwater levels and chloride levels, 1960 to 1964. Legend is shown in Figure 37.

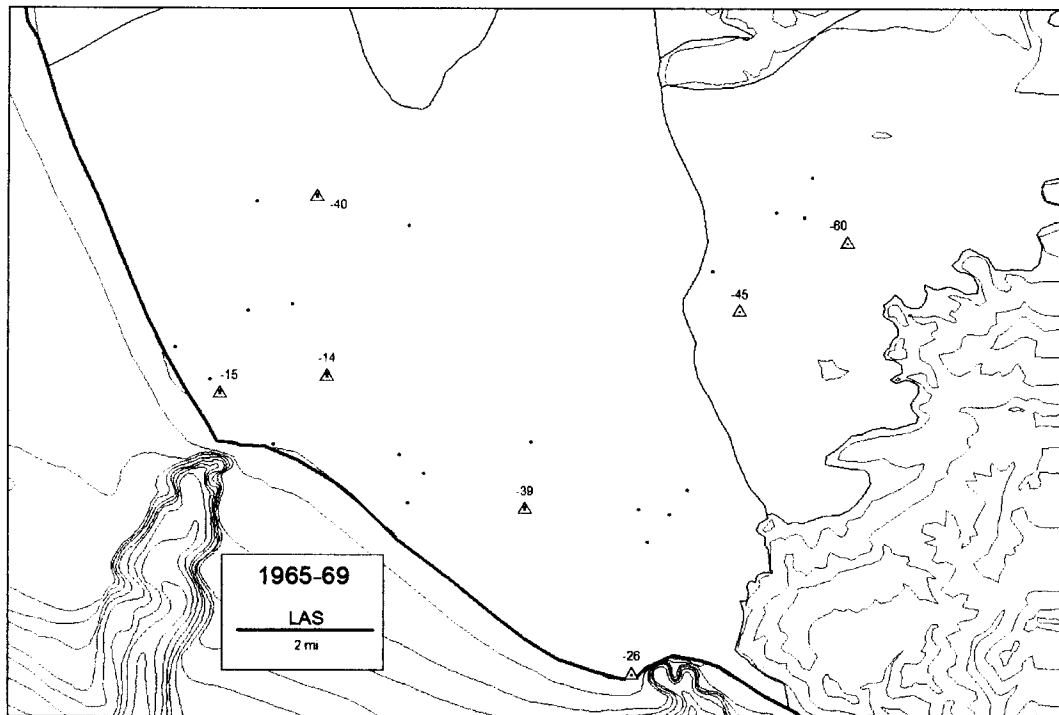


Figure 42. Lower Aquifer System groundwater levels and chloride levels, 1965 to 1969. Legend is shown in Figure 37.

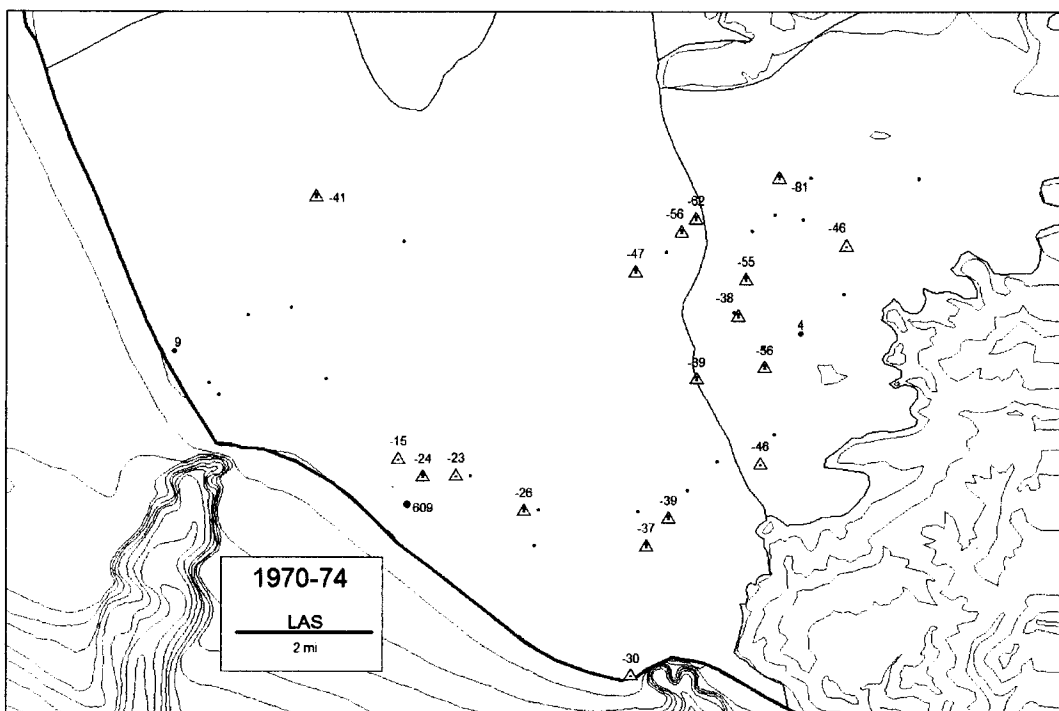


Figure 43. Lower Aquifer System groundwater levels and chloride levels, 1970 to 1974. Legend is shown in Figure 37.

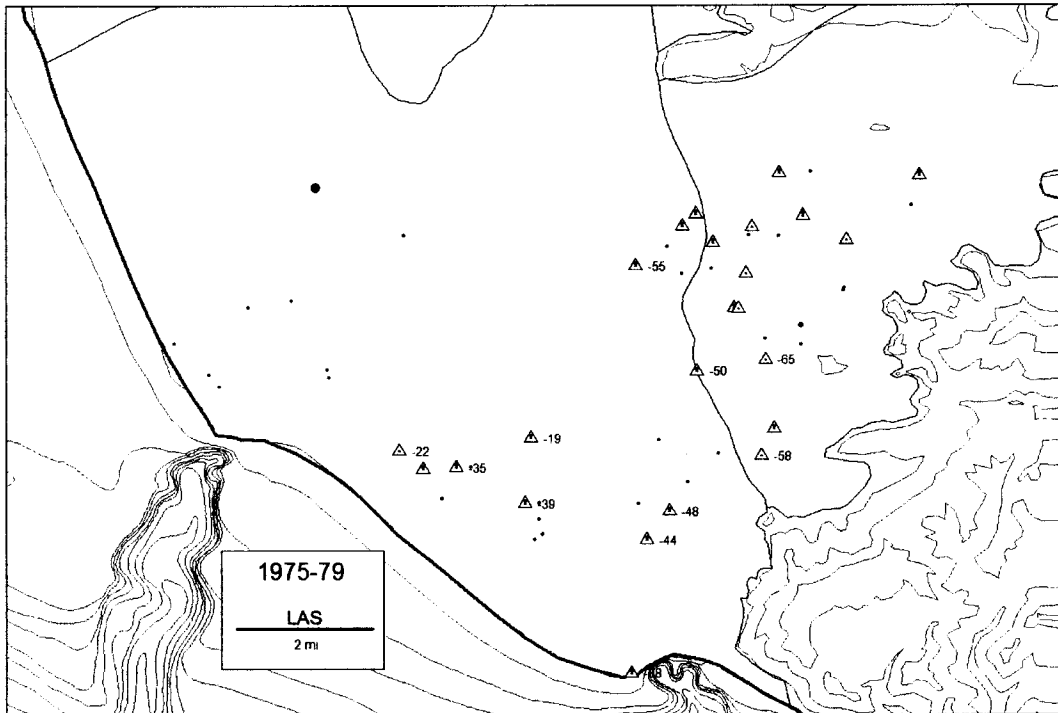


Figure 44. Lower Aquifer System groundwater levels and chloride levels, 1975 to 1979. Legend is shown in Figure 37.

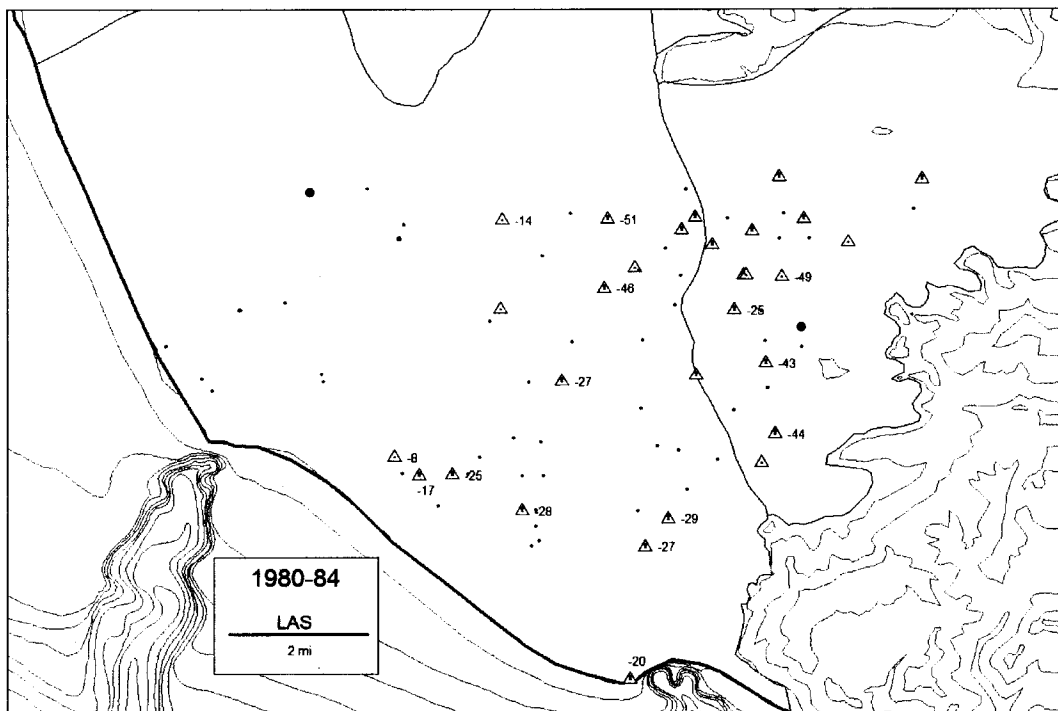


Figure 45. Lower Aquifer System groundwater levels and chloride levels, 1980 to 1984. Legend is shown in Figure 37.

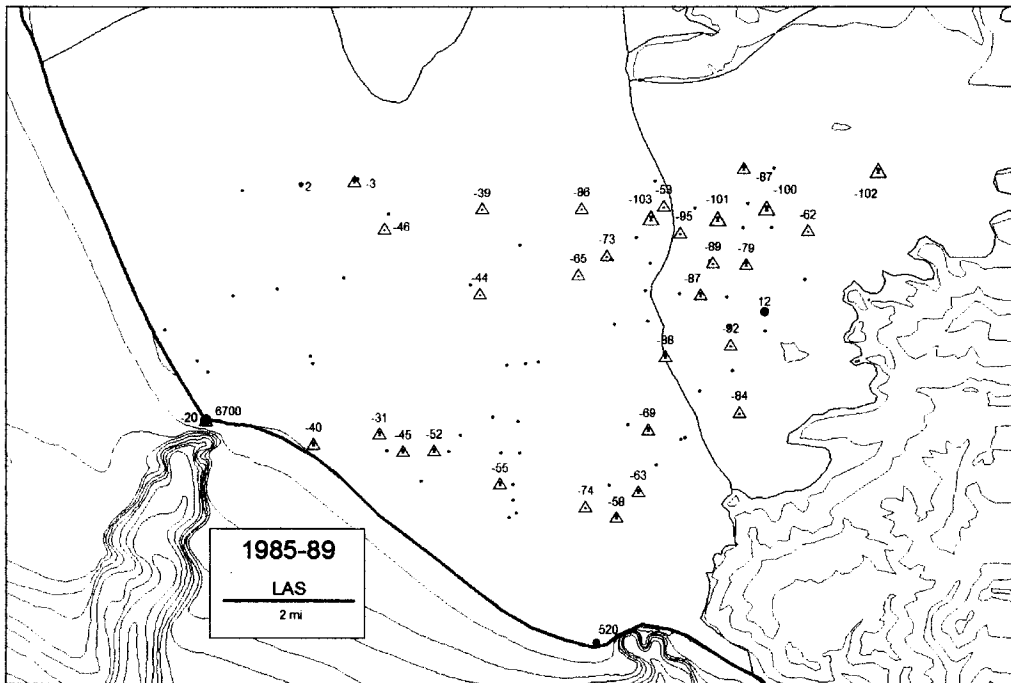


Figure 46. Lower Aquifer System groundwater levels and chloride levels, 1985 to 1989. Legend is shown in Figure 37. Note start of seawater intrusion (red dot) at head of Hueneme Submarine Canyon.

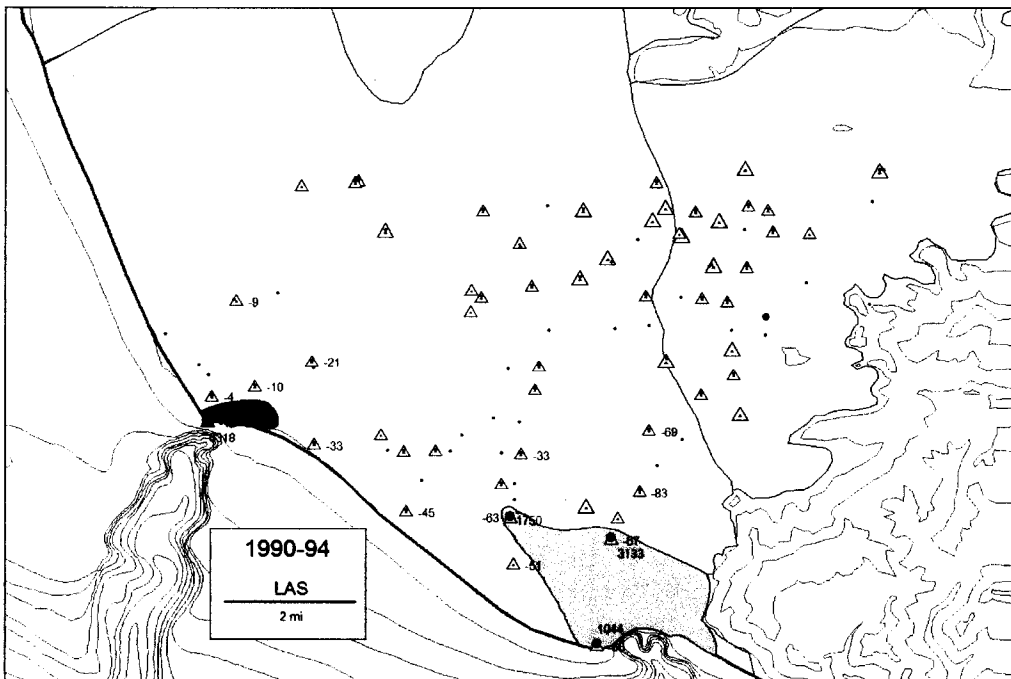


Figure 47. Lower Aquifer System groundwater levels and chloride levels, 1990 to 1994. Legend is shown in Figure 37. Source of saline intruded areas: reddish brown is from seawater; yellow-orange is from sediments.

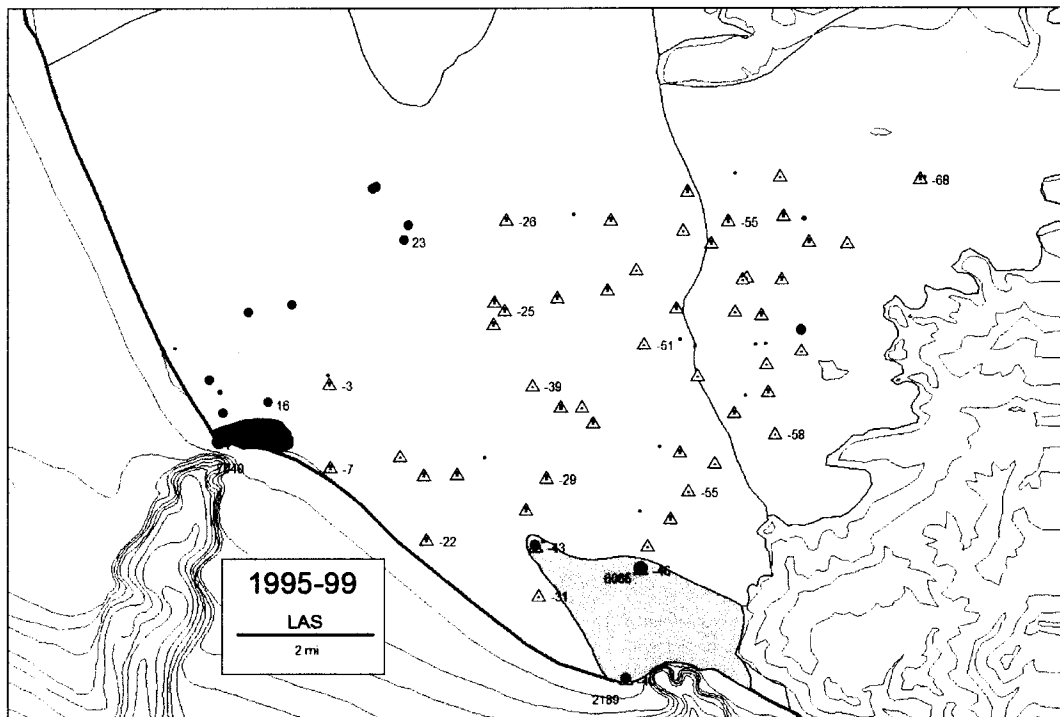


Figure 48. Lower Aquifer System groundwater levels and chloride levels, 1995 to 1999. Legend is shown in Figure 37. Source of saline intruded areas: reddish brown is from seawater; yellow-orange is from sediments.

APPENDIX B. VENTURA REGIONAL GROUNDWATER MODEL

INTRODUCTION

The Ventura Regional Groundwater Model is a tool developed to evaluate multifaceted conjunctive use groundwater management projects designed to alleviate seawater intrusion, overdraft, land subsidence and other problems. These projects include in-lieu use of surface water, shifts in pumping and waste water effluent recycling.

The regional groundwater flow model was originally developed by the U.S. Geological Survey (Hanson and others, 2003) as part of the Regional Aquifer Systems Analysis (RASA), jointly funded by United Water Conservation District and Ventura County Water Resources.

The model is a finite difference numerical model which uses the MODFLOW code. The USGS developed an historical model from 1891 to 1993 and a forward model based on 1970 to 1993 hydrology. The original 2 layer model (Upper Aquifer System and Lower

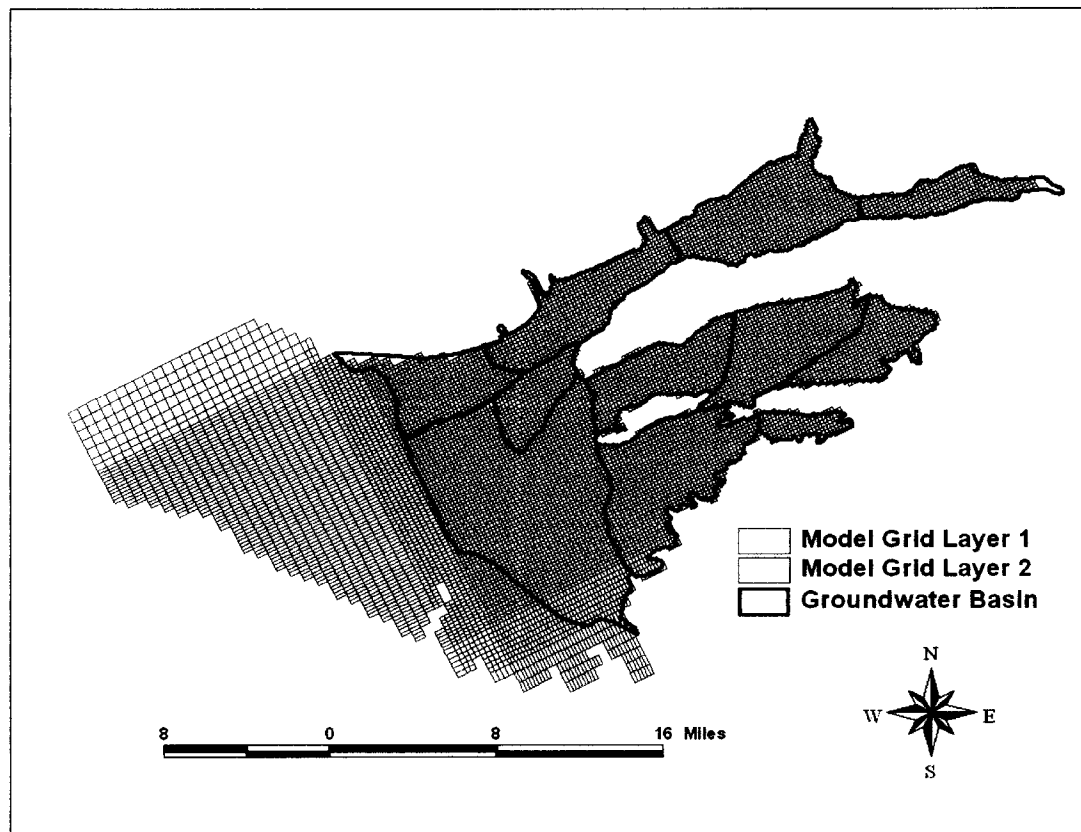


Figure 49. Updated model grid for Ventura Regional Groundwater Model.

Aquifer System) consists of a grid that contains 60 rows and 110 columns for a total of 6,600 cells (Figure 49). Within each cell a groundwater level can be computed. Volume amounts of flow can be computed from cell to cell, basin to basin and from layer to layer. The groundwater basins within the model include Piru, Fillmore, Santa Paula, Mound, Oxnard Plain Forebay, Oxnard Plain, Pleasant Valley, East Las Posas, West Las Posas, South Las Posas, and Santa Rosa.

Water resource inputs to the model include streamflow, artificial recharge, onshore flow, effluent recharge, recharge on permeable mountain front outcrops, rainfall infiltration on the valley floor, groundwater storage within the permeable sand and gravel aquifers. Water resource outputs include offshore flow and pumping.

The United Water Conservation District has recently modified the groundwater model. The modifications include the following:

- Model was put on user friendly *Groundwater Vistas* platform. This eliminates having to run the model in DOS.
- Refinement of cell size from 1/2 mile x 1/2 mile to 1/6 mile x 1/6 mile for the alluvial basins. This, for example, enables the artificial recharge water to more accurately be input to the appropriate area instead of overlapping into the river.
- Reduction in grid size. In the original USGS model only 28% of the grid cells are active. In the modified model 47% of grid cells are active (ETIC, 2003).
- Extension of the historical and forward model to include 1994 to 2000 hydrology.
- Addition of a zone of lower hydraulic conductivity in the Lower Aquifer System extending in a linear trend from the Camarillo Hills anti-cline to Port Hueneme. This is to simulate the maximum uplift and truncation of the more permeable upper portion of the Lower Aquifer System along this linear trend.
- Addition of an additional layer in the upper basins of Piru, Fillmore, and Santa Paula to better simulate the more permeable alluvium along the Santa Clara River, Sespe Creek, Santa Paula Creek and Piru Creek.
- Recalibration of the Forebay and Oxnard Plain portions of the model over the period 1983 to 1998 to reflect the increased diversions and recharge that have occurred in this area since the USGS originally calibrated the model (UWCD, 2006b).
- Expansion of the forward model period to a full 55 years that reflect the climate and hydrology of the years 1944 to 1998. This period is a commonly-used base period because it starts and ends in very wet years, spans several wet and dry cycles, and represents zero cumulative departure for rainfall across the period.

The regional groundwater flow model has been used in the following projects and analyses:

- Oxnard Plain LAS and UAS overdraft analysis – UWCD (2001)
- GREAT Project EIR – UWCD and City of Oxnard
- Las Posas Basin ASR project operations – Calleguas MWD
- City of Fillmore water supply planning – UWCD and City of Fillmore
- Pleasant Valley AB303 grant study – UWCD

- Fox Canyon Groundwater Management Agency Groundwater Management Plan – UWCD and FCGMA

MODELING FOR THE FCGMA GROUNDWATER MANAGEMENT PLAN

The Ventura Regional Groundwater Model was used to evaluate all FCGMA management strategies that change the water budget within the FCGMA – that is, all projects that have recharge and/or groundwater pumping components. The model is a groundwater flow model, not a chemical transport model, so water quality changes could not be directly tested. However, water quality changes could be inferred from the groundwater flows and groundwater elevations in cases such as seawater intrusion – we know how high groundwater elevations need to be at the coastline to prevent seawater from intruding into the aquifers.

The method of evaluation of management strategies was straightforward:

- 1) First, the forward model was used to determine conditions in the aquifer using only existing strategies and facilities (Base Case).
- 2) Each strategy was independently added to the Base Case and was run through the forward model (one model run for each strategy). A final model simulation combined all the strategies to determine if together they could solve the overdraft conditions. For ease of evaluation, it was assumed that the new strategy was in place at the beginning of the model period and remained in place for the entire model period.
- 3) Groundwater elevation results for all the time steps within the forward model were extracted for each of the wells for which there are water-level BMOs. Water levels at the BMO wells were compared between the Base Case and the individual management strategy to determine the effect of the strategy in meeting water-level BMOs.

BASE CASE

The Base Case included strategies and facilities currently in place. Although the hydrology of the 55 years of the forward model is based on historical data, several other model inputs are different than they were during the historic period. For instance, the Freeman Diversion allows greater diversions now than were possible before it was constructed; these additional diversions are factored into the forward model. Likewise, groundwater extractions have been reduced during the past 15 years and the forward model must reflect these changes. To calculate the correct extractions for the forward model, the 55-year period was divided into dry, average, and wet years depending upon historical rainfall and streamflow for each model year. There were roughly equal numbers of dry, average, and wet years in the model. Representative data for dry, average, and wet years were used to approximate pumping during the model period; the representative pumping included only the previous 15 years since FCGMA pumping has been reduced and was adjusted to reflect the current 15% FCGMA pumping reduction.

The average pumping over the 55-year period of the forward model was calculated to be equivalent to the actual average pumping of the past 15 years (adjusted for FCGMA pumping reductions).

The Base Case does not include potential future changes in pumping or recharge – it represents today’s social, economic, and water use conditions, but tests the status quo over a range of hydrologic conditions. In this manner, various groundwater management strategies can be modeled and compared to the Base Case with no other changing conditions to complicate the comparison. Additional model simulations could factor in such changes as potential land use conversion (e.g., agriculture to urban), but it is appropriate to have these model simulations separate from the Base Case.

The Base Case is the starting point for each of the management strategies that were evaluated with the model. Each simulation discussed below simply adds the new management strategy to the Base Case for comparison. The only exception is the Combined Strategies simulation, where all the modeled strategies are combined in a single simulation.

<i>Base Case Evaluation</i>	<i>Upper Aquifer</i>	<i>Lower Aquifer</i>
<i>BMO Avg (ft msl)</i>	5.3	17.6
<i>Base Case</i>		
<i>Avg (ft msl)</i>	3.7	-40.0
<i>% of Time Above BMO</i>	51%	5%

Table 9. Results of Base Case groundwater model simulation. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

SENSITIVITY ANALYSIS – UNDERSTATEMENT OF REPORTED EXTRACTIONS

Concerns have been voiced that pumping reported to the FCGMA may be understated by agricultural irrigators because of either poorly-calibrated water meters or inaccuracies in using other reporting methods. To test the effect of understated pumping on modeling results, the Base Case was modified to increase agricultural pumping by 15% during all hydrologic conditions (i.e., wet, average, and dry model years). This modified simulation yielded lower groundwater levels, as would be expected (Table 10).

<i>Pumping Sensitivity Analysis</i>	<i>Upper Aquifer</i>	<i>Lower Aquifer</i>
<i>Change in Avg BMO Water Levels (ft)</i>	-7.3	-15.0
<i>Change in % of Time Above BMO</i>	-9%	-3%

Table 10. Change in model results for the Base Case if actual agricultural pumping was increased by 15%. The negative changes indicate that groundwater levels would be lower at BMO wells and the percentage of time that groundwater levels were above BMOs would be less.

The sensitivity analysis indicates that the Base Case modeling results may be overestimating future groundwater levels. However, if the model was recalibrated in the future to correct for any understatement of pumping, it is likely that the results would not look much different than the present Base Case. This would happen because if pumping was increased over the calibration period, then this pumping must be balanced by additional recharge that has not been accounted for. If the re-calibrated model has more recharge, then the increased pumping that would be added to the Base Case would potentially be offset by this increased recharge.

The main conclusion to be drawn from the sensitivity analysis is that the current management strategies for the basin may not be as effective as modeled, but not by any amount that would change conclusions of this Plan. More management strategies are still required, and because most of the modeling effort compares one strategy against another (a comparative rather than an absolute analysis), errors will be relatively small. However, if the meter calibration effort planned by the FCGMA proves that there is indeed understating of pumping, the model should be recalibrated to ensure that errors are marginalized.

CONTINUATION OF 25% PUMPING REDUCTION

This simulation compares attainment of BMOs between current 15% pumping reduction and full 25% pumping reduction. The 15% pumping reduction is the Base Case for the model. Thus, an additional 10% pumping reduction is applied for this comparison simulation. This reduction is applied only to M&I wells because agricultural wells have already taken actions that have reduced pumping in excess of 25% and it is unlikely that any additional steps in changing irrigation methods will be undertaken before the 2010 date for full implementation of the 25% pumping reductions. .

Pumping for each M&I well in the model is reduced by an additional 10% for the complete model period. This results in 3,800 AFY of reduced pumping across the FCGMA.

The results of this simulation are indicated in Table 11.

<i>25% Reduction Evaluation</i>	<i>Upper Aquifer</i>	<i>Lower Aquifer</i>
<i>BMO Avg Level (ft msl)</i>	5.3	17.6
<i>Base Case</i>		
<i>Avg Level (ft msl)</i>	3.7	-40.0
<i>% of Time Above BMO</i>	51%	5%
<i>25% Pumping Reduction</i>		
<i>Avg Level (ft msl)</i>	4.9	-37.8
<i>Improve from Base Case (ft)</i>	1.2	2.2
<i>% of Time Above BMO</i>	53%	7%

Table 11. Results of groundwater model simulation for the continuation of the 25% FCGMA pumping reduction. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

RIVERPARK RECHARGE PITS

Compares attainment of BMOs between current recharge operations (Base Case) and the addition of the Riverpark Recharge pits. Using UWCD's daily river routing model, available stormflow that is not already diverted by the Freeman Diversion is diverted to the Riverpark Recharge Pits for percolation and recharge. This additional recharge is generally only available during the winter and spring of wetter years when river flow exceeds UWCD's current recharge capabilities. The amount of recharge water applied in any one quarter to the model for the Riverpark pits is calculated in daily increments through the river routing model, and takes into account both water availability and recharge capacity in the pits. The extra recharge varies from an average of 400 AFY in dry years to an average of 11,500 AFY during wet years.

The results of this simulation are indicated in Table 12.

<i>Riverpark Recharge Evaluation</i>	<i>Upper Aquifer</i>	<i>Lower Aquifer</i>
<i>BMO Avg Level (ft msl)</i>	5.3	17.6
<i>Base Case</i>		
<i>Avg Level (ft msl)</i>	3.7	-40.0
<i>% of Time Above BMO</i>	51%	5%
<i>Riverpark Recharge</i>		
<i>Avg Level (ft msl)</i>	3.7	-40.0
<i>Improve from Base Case (ft)</i>	<0.1	<0.1
<i>% of Time Above BMO</i>	52%	6%

Table 12. Results of groundwater model simulation for the Riverpark Recharge project. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

GREAT PROJECT

This simulation compares attainment of BMOs between current basin operations (Base Case) and the addition of the GREAT project. This simulation was performed in two parts to reflect the two phases of the project that were evaluated in the City of Oxnard's EIR for the project. Although the project phases are in reality scheduled sequentially, the model simulates each phase separately to determine the effectiveness of each. For model purposes, Phase I includes 5,000 AFY of reclaimed water, with one fourth of the water being injected in the Oceanview area of the south Oxnard Plain during the first quarter of each year when agricultural demand is low, and three fourths of the water delivered to agricultural irrigators within the PTP service area in-lieu of pumping their own wells. The City of Oxnard then retrieves the 5,000 AFY of injection/in-lieu recharge (as storage credits) equally from UWCD's O-H wellfield in the Oxnard Plain Forebay and the City's Water Yard wells located just outside the Forebay.

The Phase II model simulation includes 21,000 AFY of reclaimed water delivered in the same proportions between direct injection and in-lieu deliveries. However, the area receiving reclaimed water for irrigation is expanded to include the Pleasant Valley County Water District delivery area. In addition, the winter injection is accomplished through a series of barrier wells located along Highway 1 and Hueneme Road. The City of Oxnard then retrieves one-third of the 21,000 AFY of injection/in-lieu recharge (as storage credits) from UWCD's O-H wellfield in the Oxnard Plain Forebay and two-thirds from the City's own wells located just outside the Forebay.

Phase I Results: The results of this simulation are indicated in Table 13. The 8-foot improvement in Lower Aquifer groundwater levels at BMO wells is partially offset by the drop of less than one foot in Upper Aquifer BMO wells. The average drop in groundwater levels in the Oxnard Plain Forebay basin resulting from the extraction of the FCGMA credits is 2 to 3 feet.

<i>GREAT Project Phase I Evaluation</i>	<i>Upper Aquifer</i>	<i>Lower Aquifer</i>
<i>BMO Avg Level (ft msl)</i>	5.3	17.6
<i>Base Case</i>		
<i>Avg Level (ft msl)</i>	3.7	-40.0
<i>% of Time Above BMO</i>	51%	5%
<i>GREAT Project Phase I</i>		
<i>Avg Level (ft msl)</i>	3.4	-31.9
<i>Improve from Base Case (ft)</i>	-0.3	8.1
<i>% of Time Above BMO</i>	51%	9%

Table 13. Results of groundwater model simulation for Phase I of the GREAT project at full capacity. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

Phase II Results: The results of this simulation are indicated in Table 14. The 38-foot improvement in Lower Aquifer groundwater levels at BMO wells is partially offset by

the one-foot drop in Upper Aquifer BMO wells. The average drop in groundwater levels in the Oxnard Plain Forebay basin resulting from the extraction of the FCGMA credits is 6 to 11 feet.

<i>GREAT Project Phase II Evaluation</i>	<i>Upper Aquifer</i>	<i>Lower Aquifer</i>
<i>BMO Avg Level (ft msl)</i>	5.3	17.6
<i>Base Case</i>		
<i>Avg Level (ft msl)</i>	3.7	-40.0
<i>% of Time Above BMO</i>	51%	5%
<i>GREAT Project Phase II</i>		
<i>Avg Level (ft msl)</i>	2.6	-1.5
<i>Improve from Base Case (ft)</i>	-1.1	38.5
<i>% of Time Above BMO</i>	51%	36%

Table 14. Results of groundwater model simulation for Phase II of the GREAT project at full capacity. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

SHIFT SOME PUMPING FROM LAS TO UAS

This simulation compares attainment of BMOs between current basin operations (Base Case) and the shifting of some pumping from the Lower Aquifer back to the Upper Aquifer in critical areas. For purposes of the model scenario, pumping is shifted only in the area of the Oxnard Plain basin where Lower Aquifer groundwater levels are well below sea level (southwest of the zone of low conductance that extends from the Camarillo Hills to Port Hueneme). Actual FCGMA policy might vary from this, but the model run demonstrates the effect of this policy change in a discrete area. In the simulation, 5,000 AFY of Lower Aquifer System pumping is moved to nearby Upper Aquifer System wells (or new UAS wells if necessary). There is no shift in pumping in areas where UAS water quality is not suitable for irrigation.

The results of this simulation are indicated in Table 15.

<i>LAS to UAS Evaluation</i>	<i>Upper Aquifer</i>	<i>Lower Aquifer</i>
<i>BMO Avg Level (ft msl)</i>	5.3	17.6
<i>Base Case</i>		
<i>Avg Level (ft msl)</i>	3.7	-40.0
<i>% of Time Above BMO</i>	51%	5%
<i>LAS to UAS Shift</i>		
<i>Avg Level (ft msl)</i>	2.6	-31.8
<i>Improve from Base Case (ft)</i>	-1.1	8.2
<i>% of Time Above BMO</i>	50%	9%

Table 15. Results of groundwater model simulation for shifting 5,000 AFY of pumping from the Lower to the Upper Aquifer in the south Oxnard Plain basin. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

IMPORT ADDITIONAL STATE WATER

This scenario compares attainment of BMOs between current basin operations (Base Case) and the purchase and recharge of additional State Water. For the purposes of this model simulation, an additional 10,000 AF of State Water is purchased during average and dry years, delivered to Lake Piru, and then released down the Santa Clara River as part of UWCD's normal conservation release. The portion of this water that is likely to reach the Freeman Diversion, as calculated separately using UWCD's daily river routing model, is then diverted at the Freeman Diversion and recharged in UWCD's spreading ponds in the Oxnard Plain Forebay basin.

The results of this simulation are indicated in Table 16. Average groundwater levels in the Oxnard Plain Forebay basin would be 4 to 6 ft higher than the Base Case, providing mitigation for other strategies that have a component of pumping additional groundwater from the Forebay.

<i>Import State Water Evaluation</i>	<i>Upper Aquifer</i>	<i>Lower Aquifer</i>
<i>BMO Avg Level (ft msl)</i>	5.3	17.6
<i>Base Case</i>		
<i>Avg Level (ft msl)</i>	3.7	-40.0
<i>% of Time Above BMO</i>	51%	5%
<i>Import SWP</i>		
<i>Avg Level (ft msl)</i>	5.5	-38.7
<i>Improve from Base Case (ft)</i>	1.8	1.3
<i>% of Time Above BMO</i>	54%	7%

Table 16. Results of groundwater model simulation of importing additional State Water.

Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

INCREASE DIVERSIONS FROM SANTA CLARA RIVER

This simulation compares attainment of BMOs between current basin operations (Base Case) and increasing recharge from the Santa Clara River during periods of high stormflow. For purposes of this model simulation, it is assumed that the diversion rate and license of the Freeman Diversion is increased to 1,000 cfs from its current 375 cfs. Thus, during times of high flow, up to 1,000 cfs could be diverted. These additional diversions are recharged at UWCD's facilities according to their unused capacity, as determined by UWCD's daily river routing model. For purposes of the model scenario, it is assumed that the Riverpark recharge facility is available and that the Ferro gravel pit has been converted to use for recharge and storage.

The results of this simulation are indicated in Table 17. Average groundwater levels in the Oxnard Plain Forebay basin would be 6 ft higher than the Base Case, providing mitigation for other strategies that have a component of pumping additional groundwater from the Forebay.

<i>Increase Diversions Evaluation</i>	<i>Upper Aquifer</i>	<i>Lower Aquifer</i>
BMO Avg Level (ft msl)	5.3	17.6
Base Case		
<i>Avg Level (ft msl)</i>	3.7	-40.0
<i>% of Time Above BMO</i>	51%	5%
Increase Diversions		
<i>Avg Level (ft msl)</i>	6.4	-37.4
<i>Improve from Base Case (ft)</i>	2.7	2.6
<i>% of Time Above BMO</i>	54%	8%

Table 17. Results of groundwater model simulation for increasing diversions from the Santa Clara River. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

ADDITIONAL IN-LIEU DELIVERIES TO SOUTH OXNARD PLAIN

This model scenario compares attainment of BMOs between current basin operations (Base Case) and the delivery of additional in-lieu recharge water to the south Oxnard Plain. For purposes of this model simulation, it is assumed that there are 3,000 AFY of in-lieu water available for delivery to irrigation irrigators in the area south of the end of the PTP Pipeline. This in-lieu water delivery is adjusted for changes in quarterly agricultural demand.

The results of this simulation are indicated in Table 18.

<i>In-Lieu S Oxnard Plain Evaluation</i>	<i>Upper Aquifer</i>	<i>Lower Aquifer</i>
BMO Avg Level (ft msl)	5.3	17.6
Base Case		
<i>Avg Level (ft msl)</i>	3.7	-40.0
<i>% of Time Above BMO</i>	51%	5%
In-Lieu S Oxnard Plain		
<i>Avg Level (ft msl)</i>	4.9	-35.9
<i>Improve from Base Case (ft)</i>	1.2	4.1
<i>% of Time Above BMO</i>	53%	7%

Table 18. Results of groundwater model simulation of delivering additional in-lieu water to pumpers on the southern Oxnard Plain basin. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

SHIFT SOME PUMPING TO NORTHWEST OXNARD PLAIN

This simulation compares attainment of BMOs between current basin operations (Base Case) and shifting some pumping to the northwest Oxnard Plain from areas less easily recharged. For this model simulation, it is assumed that 2,000 AFY of M&I pumping is moved from the portion of the Oxnard Plain near the Forebay basin to the northwest

Oxnard Plain. This pumping is shifted from the City of Oxnard's Water Yard and Blending Station to the area within 2 miles of the ocean along Gonzalez Rd.

The results of this simulation are indicated in Table 19.

<i>Shift NW Oxnard Plain Evaluation</i>	<i>Upper Aquifer</i>	<i>Lower Aquifer</i>
<i>BMO Avg Level (ft msl)</i>	5.3	17.6
<i>Base Case</i>		
<i>Avg Level (ft msl)</i>	3.7	-40.0
<i>% of Time Above BMO</i>	51%	5%
<i>Shift NW Oxnard Plain</i>		
<i>Avg Level (ft msl)</i>	3.9	-39.7
<i>Improve from Base Case (ft)</i>	0.2	0.3
<i>% of Time Above BMO</i>	51%	5%

Table 19. Results of groundwater model simulation of shifting some pumping to the northwestern portion of the Oxnard Plain basin. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

INJECTION OF TREATED RIVER WATER IN OVERDRAFTED BASINS

This model scenario compares attainment of BMOs between current basin operations (Base Case) and the injection of treated river water into the south Oxnard Plain and Pleasant Valley areas when there are unused river diversions either during the wet portion of the year or during extended times during very wet years. The rate of injection was varied from 1,500 AFY during dry years to 5,000 AFY during wet years. For purposes of this simulation, it is assumed that the injection sites are located both within the PTP system and the Pleasant Valley CWD service area along the deepest portion of LAS pumping depression.

The results of this simulation are indicated in Table 20.

<i>Injecting River Water Evaluation</i>	<i>Upper Aquifer</i>	<i>Lower Aquifer</i>
<i>BMO Avg Level (ft msl)</i>	5.3	17.6
<i>Base Case</i>		
<i>Avg Level (ft msl)</i>	3.7	-40.0
<i>% of Time Above BMO</i>	51%	5%
<i>Injecting River Water</i>		
<i>Avg Level (ft msl)</i>	5.0	-32.6
<i>Improve from Base Case (ft)</i>	1.3	7.4
<i>% of Time Above BMO</i>	53%	11%

Table 20. Results of groundwater model simulation of injecting treated river water in the south Oxnard Plain and Pleasant Valley areas. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

SWITCH LOCATION OF CITY OF CAMARILLO PUMPING

To test the effectiveness of moving pumping from near the Camarillo airport to an area along the Arroyo Las Posas (see section *Development of Brackish Groundwater, Pleasant Valley Basin*), the pumping from the airport well was eliminated for the model simulation. Model results indicate that the worst portion of the pumping depression would be decreased considerably in size, leaving a smaller depression in the southern Pleasant Valley basin (Figure 50).

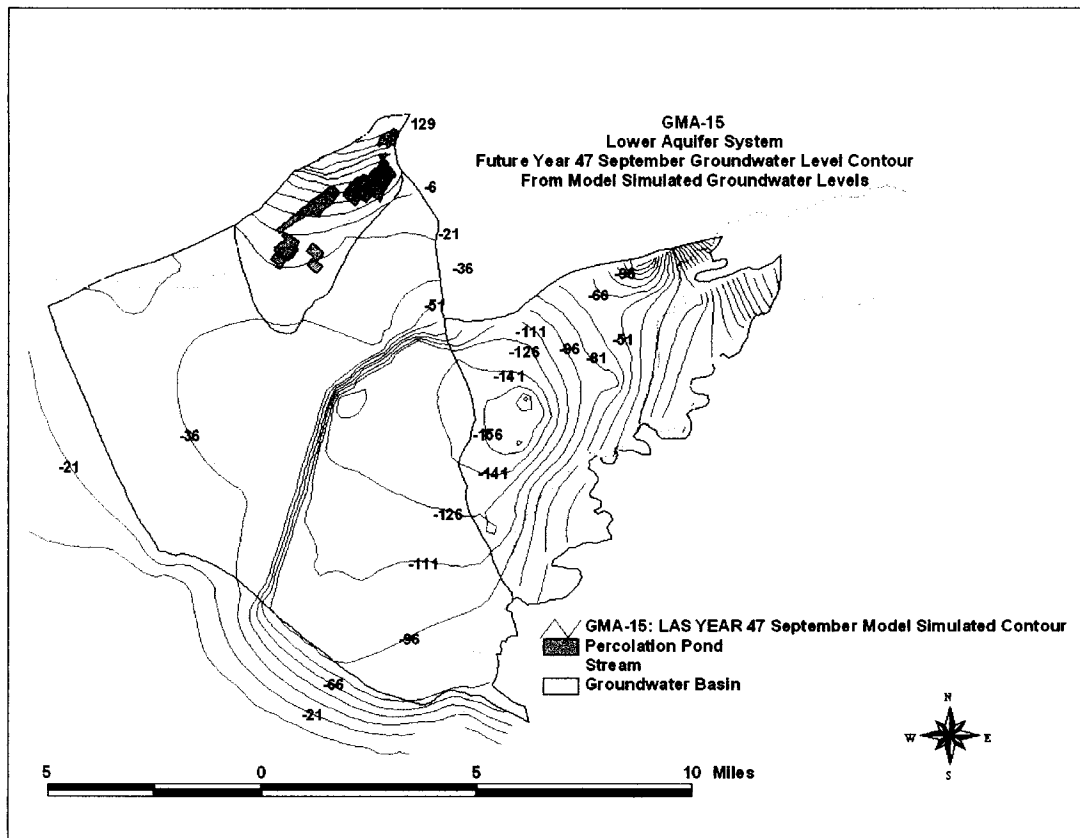


Figure 50. Simulated groundwater elevations for the LAS during the model year corresponding to the 1990 drought year, when the pumping trough beneath Pleasant Valley and the south Oxnard Plain was most pronounced. The elimination of pumping from the City's airport well decreased the size of the northern portion of the pumping depression.

FULL-TIME BARRIER WELLS IN SOUTH OXNARD PLAIN

This simulation compares attainment of BMOs between current basin operations (Base Case) and the use of barrier wells in the south Oxnard Plain to build a recharge mound that prevents coastal chloride contamination from moving further inland. The effectiveness of barrier wells was partially tested for the GREAT project. This simulation assumes that there is water available during the entire year for injection – the actual water available would likely be a combination of recycled water and other water

sources. To dovetail with the GREAT simulation's winter-only injection scenario, the water available for injection in the barrier wells was modeled at 21,000 AFY, which was injected at a constant rate throughout the year. The barrier wells used in the simulation are identical to the locations of the GREAT Phase II barrier wells along Highway 1 and Hueneme Road.

The results of this simulation are indicated in Table 21.

<i>Barrier Wells Evaluation</i>	<i>Upper Aquifer</i>	<i>Lower Aquifer</i>
<i>BMO Avg Level (ft msl)</i>	5.3	17.6
<i>Base Case</i>		
<i>Avg Level (ft msl)</i>	3.7	-40.0
<i>% of Time Above BMO</i>	51%	5%
<i>Barrier Wells</i>		
<i>Avg Level (ft msl)</i>	15.2	6.5
<i>Improve from Base Case (ft)</i>	11.5	46.5
<i>% of Time Above BMO</i>	63%	48%

Table 21. Results of groundwater model simulation for a barrier well project in the south Oxnard Plain. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

COMBINED MANAGEMENT STRATEGIES

The management strategies used in the previous simulations were combined in a single model run to determine their overall combined effect in reaching BMOs. This model simulation is an indicator of whether additional management strategies are needed beyond those in this Plan.

The results of this simulation are indicated in Table 22. The most important result is that the combined management strategies allow BMOs to be met 67% of the time in the Upper Aquifer and 76% of the time in the Lower Aquifer. This result suggests that if all the management strategies in the Plan are implemented, the basin would be relatively safe from saline intrusion (see discussion in section *Basin Yield* on level of attainment of BMOs).

<i>Combined Strategies Evaluation</i>	<i>Upper Aquifer</i>	<i>Lower Aquifer</i>
<i>BMO Avg Level (ft msl)</i>	5.3	17.6
<i>Base Case</i>		
<i>Avg Level (ft msl)</i>	3.7	-40.0
<i>% of Time Above BMO</i>	51%	5%
<i>Combined Strategies</i>		
<i>Avg Level (ft msl)</i>	18.4	59.8
<i>Improve from Base Case (ft)</i>	14.7	99.8
<i>% of Time Above BMO</i>	67%	76%

Table 22. Results of groundwater model simulation of implementing the combination of all the management strategies evaluated using the groundwater model. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

APPENDIX C. EAST LAS POSAS BASIN MANAGEMENT PLAN

As the result of several years of discussions about groundwater issues in the Las Posas basin by East Las Posas basin pumpers and Calleguas Municipal Water District, meeting, a management plan for the East Las Posas basin has been developed. This group, which meets every second month as the informal Las Posas Basin Users Group, discusses both basin-wide groundwater issues and potential issues related to Calleguas' Las Posas Basin ASR project. One of the results of these meetings has been the East Las Posas Basin Management Plan, which outlines a monitoring plan, action levels, and responsibilities for groundwater within the basin.

The East Las Posas Basin Management Plan is attached to the FCGMA Management Plan to be adopted by the FCGMA Board as part of the overall FCGMA Management Plan. The East Las Posas Management Plan will be reviewed and updated regularly.

The Plan begins on the following page.

**EAST LAS POSAS BASIN
MANAGEMENT PLAN**

THIS MANAGEMENT PLAN FOR THE EAST LAS POSAS BASIN (the “Plan”) is effective as of _____, 2006, and is created with reference to the following recitals of fact, understandings and intentions:

RECITALS

- A.** Calleguas Municipal Water District (“Calleguas”) operates an Aquifer Storage and Recovery Project (“ASR”) for the benefit of its urban, industrial and agricultural water delivery customers in the Las Posas Basin (“Basin”) in Ventura County, California.
- B.** The Basin is identified as a groundwater subsystem within the boundaries of the Fox Canyon Groundwater Management Agency (“GMA”).
- C.** The ASR project stores potable water in the aquifers of the Basin for use during emergencies and drought periods.
- D.** The Las Posas Basin Pumpers extract groundwater from the Basin for beneficial uses that include agricultural, domestic, urban and industrial uses. The “Las Posas Basin Pumpers” includes members of the Las Posas Basin Users Group and all other persons or entities extracting groundwater from the East Las Posas Basin (within the boundaries of the GMA).
- E.** Calleguas and the Las Posas Basin Pumpers desire to manage the groundwater basin such that the ASR project and the Las Posas Basin Pumpers’ beneficial uses co-exist to the benefit of all.
- F.** Calleguas has previously entered into an agreement with the GMA for operation of the ASR project (“Calleguas-GMA Agreement”). A copy of the Calleguas-GMA Agreement is attached hereto as Exhibit “A” and incorporated herein by reference. The Calleguas-GMA Agreement describes the general principles within which the ASR project will operate.
- G.** Pursuant to the Calleguas-GMA Agreement, stored water is credited to the ASR project when Calleguas either injects potable water into the aquifer through wells or when water is delivered by or through Calleguas to the Las Posas Basin Pumpers in lieu of pumping groundwater. The storage credit pursuant to the Calleguas-GMA Agreement remains in the Basin until the stored water is extracted.
- H.** Calleguas and the Las Posas Basin Pumpers desire to have the GMA incorporate the terms of this Plan into the updated GMA plan.

NOW, THEREFORE, in consideration of the mutual benefits, covenants and promises set forth herein, the Management Plan for the East Las Posas Basin is as follows:

1. **Monitoring Program.** Calleguas will maintain a monitoring program to track changes in groundwater levels and groundwater quality in the Basin. This monitoring program will consist of two parts: (1) a set of four representative key wells spaced throughout the Basin (“baseline key wells”) will monitor the overall health of the Basin (Exhibit “B” and identified by State Well number); and (2) a set of monitoring and producing wells on parcels within or adjacent to the ASR project (“local vicinity wells”) will monitor the effects of the ASR injection and pumping on the Basin (Exhibit “C”).
2. **Report of Results of Monitoring Program.** Calleguas will report results of the monitoring program described in paragraph 1 above in writing to the Las Posas Basin Pumpers at least every six (6) months during noticed meetings of the Las Posas Basin Users Group. In addition, Calleguas will prepare a written report on ASR activities, monitoring results and the state of the Basin annually, and that report will also be made available to the Las Posas Basin Users Group.
3. **Extractions and Storage Credits.** Calleguas covenants and promises that it will only extract water consistent with the Calleguas-GMA Agreement and in an amount which does not exceed Calleguas’ storage credits in the Basin, as they may exist at any time. Calleguas will apply for storage credits from the GMA annually based on the amount of water injected and in lieu water delivered that year; the GMA will maintain the storage credit balance for the ASR project and will give written notice to the Las Posas Basin Users Group of the amount of those credits annually and provide a report directly to the Las Posas Basin Users Group every six months as to the amount of storage and extractions which have occurred.
4. **Operation of ASR Project.** Calleguas will operate the ASR project in a manner that does not adversely affect the Basin by creating, by way of example only, chronic declining water levels, increased levels of TDS or chlorides, significant increased pumping lifts, or saline intrusion. It is acknowledged that all currently available information indicates that the Basin may be in overdraft. Although it is not projected that the ASR project will alleviate the overdraft, Calleguas will make a good faith effort to assist the Las Posas Basin Pumpers in reducing the overdraft. Additionally, it is recognized that there is a mound of high-chloride, high-TDS water migrating into the Basin from beneath the Arroyo Las Posas. Calleguas will assist in mitigating this water quality problem by facilitating projects that will pump this poor-quality water, treat it for agricultural and drinking water use and discharge the resulting brine into a regional brine line. To keep Las Posas Basin Pumpers informed of ASR operations, Calleguas will provide a summary sheet of injections and extractions relating to ASR operations at every Las Posas Basin Users Group meeting (held approximately every two months, but no less than 4 times a year). This summary will discuss, among other things, all injection, extraction and in-lieu activities for the two months prior to the meeting. This summary will also be provided to the GMA.

5. **Groundwater Levels.** Calleguas will operate the ASR project in a manner which will not significantly impact Las Posas Basin Pumpers' ability to use groundwater from the Basin. Impacts will be measured on two levels – basin-wide and local. Basin-wide impacts will be measured using the four baseline key wells. Local impacts will be measured using the local vicinity wells.

Basin-Wide Effects: In order to establish groundwater levels that would exist without the ASR project ("baseline"), the USGS Santa Clara-Calleguas MODFLOW groundwater flow model, as updated by United Water Conservation District and Calleguas, will be used in conjunction with the four baseline key wells. The baseline will be established by running the groundwater model every two years using all available actual pumping and hydrologic data for the period, but excluding any ASR injection/extraction operations or water deliveries in-lieu of injection. The first run of the model for purposes of this Plan will be as follows: The modeled "no ASR project" groundwater levels determined as of September 1, 2006, at the four baseline key wells would establish the baseline for the two-year period. If actual measured water levels fall below the baseline in any of the baseline key wells during the applicable two-year period, then the cause of the groundwater level decline below the baseline will be investigated by Calleguas within 45 days of Calleguas learning of the measured water level falling below the baseline. If the water level drop below baseline is determined to be caused by ASR operations, then Calleguas will present a written plan to the Las Posas Basin Pumpers to mitigate the excess drawdown. That written plan will be presented by Calleguas to the Las Posas Basin Users Group no later than 120 days after Calleguas learns that measured water levels are below baseline.

Local Effects: In the vicinity of the ASR injection/extraction wells, it is recognized that groundwater levels will fluctuate depending upon rates of injection/extraction and proximity to the wells. Nearby wells will see groundwater levels rise and pumping lifts decrease during and following injections of stored water. During extractions of stored water, groundwater levels in the vicinity of the extraction may decrease below levels normally seen in nearby wells, with this pumping effect dissipating when extraction is terminated. Calleguas will use all reasonable efforts to insure that nearby wells can continue to be pumped during this extraction period; if lowered water levels create operational problems such as the inability to pump groundwater because groundwater levels are below pump bowls or the pump breaks suction in any nearby well, Calleguas will attempt to assist well owners in mitigating the problem. Such mitigation measures may include, among other things, providing in-lieu water to well owners at prevailing rates.

6. **Disputes.** If any dispute arises over the effects of the ASR program and this Plan, the specifics of the dispute will first be presented within 45 days of the dispute arising to an advisory group of members of the Las Posas Basin Users Group numbering not less than 5. If the dispute is not resolved within 45 days after submittal to the advisory group, the dispute shall be presented to Calleguas in writing. Calleguas will then, within 45 days of receiving written notice of the dispute, investigate the issues in the dispute, including performing any hydrogeologic investigation where appropriate.

The disputing party will not unreasonably withhold access to historic groundwater data known to the party or access to wells for monitoring. Calleguas will, within 120 days, give a written reply to the disputing party which will include results of any hydrogeologic investigation. In the event that the party is not satisfied by this procedure, the disputing party can deliver a copy of the written dispute to the GMA. If the GMA does not resolve the problem to the satisfaction of the disputing party within 120 days of the delivery of a copy of the written dispute to the GMA, then the disputing party can take whatever legal action it deems appropriate.

7. **Term.** This Plan shall remain in effect so long as the Calleguas-GMA Agreement remains in effect.

8. **Existing Water Rights Unaffected.** This Plan and the ASR project shall in no way affect or alter existing water rights in the Basin or grant new or additional water rights to Calleguas or the Las Posas Basin Pumpers (other than the specific rights of injection and extraction granted herein). All injections or extractions are done with the knowledge and consent of the Las Posas Basin Pumpers and under no circumstances will any injections or extractions or pumping under this Plan ripen into a claim for prescriptive or superior rights.

9. **Condition of Basin.** This Plan is made with the express understanding and assumption that the Basin is of such condition that any water injected by Calleguas into the Basin will remain in the Basin until extracted by Calleguas (or by other pumpers). If this understanding/assumption is determined to be incorrect or determined to be substantially called into question, then **either** Calleguas or the Las Posas Basin Pumpers may immediately proceed to dispute resolution as set forth in Section 6 above.

END OF PLAN

EXHIBIT "A"**FOX CANYON
GROUNDWATER MANAGEMENT AGENCY**

BOARD OF DIRECTORS

John E. Maulhardt, Chair
John K. Flaten
Sam McIntyre
James Dauels
Michael Conroy

AGENCY COORDINATOR

Lowell Preston, Ph.D

July 12, 1994

Eric Berg, Projects Administrator
Calleguas Municipal Water District
2100 Olsen Road
Thousand Oaks, CA 91360-6800

**SUBJECT: BOARD APPROVAL OF CMWD APPLICATION FOR INJECTION/STORAGE
FACILITIES IN NORTH LAS POSAS GROUNDWATER BASIN**

Dear Mr. Berg:

At the Board of Directors meeting on February 23, 1994, the Board approved the CMWD application for injection/storage facilities in the North Las Posas Basin. The approval of this application, as provided for under Ordinance 5.3, was subject to the conditions that follow. These conditions include several changes and additions requested by the Board of Directors.

**NORTH LAS POSAS BASIN
INJECTION/STORAGE FACILITIES CONDITIONS**

1. *The identification, size, depth, well logs and location of wells used for injection/extraction will be registered with the GMA. A maximum of twenty (20) wells all to be permitted by the County of Ventura, Public Works Agency, and registered with the GMA.*
2. *Calleguas will inject/extract on a schedule determined by availability of water to inject and the needs of their customers. The number of acre-feet injected/extracted from each well shall be reported to the GMA monthly. The monthly report shall also include a water quality analysis for the injected water that covers and conforms to the limits listed for the following items:*

a.	Sodium Adsorption Ratio (SAR) calculated in meq/l as $SAR = NA / ((CA + Mg) / 2)^{.5}$	$\geq 1 \leq 4$	
b.	Total Dissolved Solids (TDS)	$>100 \leq 800$	mg/l
	Electrical conductivity (EC)	≤ 1100	uMHO
c.	Chloride (Cl)	≤ 120	mg/l
d.	Boron (H_3BO_3)	≤ 1	mg/l
e.	Nitrates	≤ 45	mg/l

(NOTE: These limits are based on University of California research. Should the University reverse these limits, the recommended changes will be incorporated into these conditions.)

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Testing shall be conducted monthly during periods of continuous injection, prior to beginning an injection of more than one hundred (100) acre-feet (but no more frequently than monthly), and as frequently as necessary when a change in water quality is suspected or known to exist.

3. *The total water in storage at any one time shall not exceed three hundred thousand (300,000) acre-feet (AF) unless approved by the GMA Board of Directors.*
4. *The point of extraction shall be the same as the point of injection or in the near vicinity. Extraction from points other than that of injection may be desirable and shall be coordinated with, and approved by the GMA.*
5. *Water stored by the facility shall be used in Ventura County.*
6. *Calleguas shall periodically review the effects of the injection on surrounding basins to ensure no detrimental effects result from the injection alone or in combination with natural recharge. Should negative effects exist, Calleguas shall take action to mitigate those effects caused by the injection program.*
7. *Should the injected water or conditions deviate from these standards, injection will stop, or not be started until the condition has been corrected.*

If you have any questions regarding this Agency's approval of your project facilities, please call Rick Farnsworth at 654-2327 or myself at 648-9204.

Very truly yours,



Lowell Preston, Ph.D.
Agency Coordinator

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EXHIBIT “B”

Key wells will be used to monitor the overall health of the basin (Figure B-1). These wells, which have a long historic monitoring record of groundwater levels, include State Well Numbers 2N/20W-8F1, 2N/20W-9F1, 3N/20W-34G1, and 3N/19W-29K4.

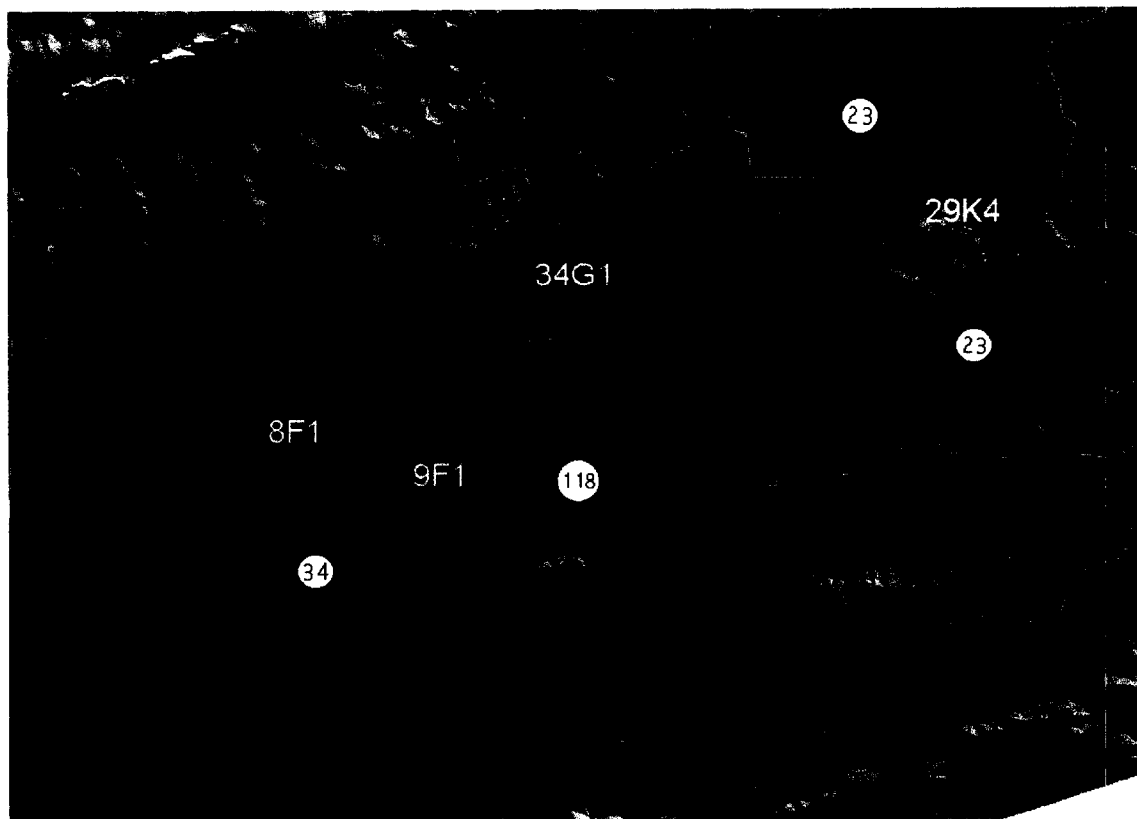


Figure B-1. Key wells in the Las Posas basin.

EXHIBIT “C”

Calleguas Municipal Water District will monitor the effects of its Las Posas Basin ASR project using both its ASR wells and additional monitoring points surrounding the ASR project (Figure C-1). These additional monitoring points will consist of existing production wells or, where necessary to complete the area 1 coverage, new monitoring well(s) installed by Calleguas MWD.

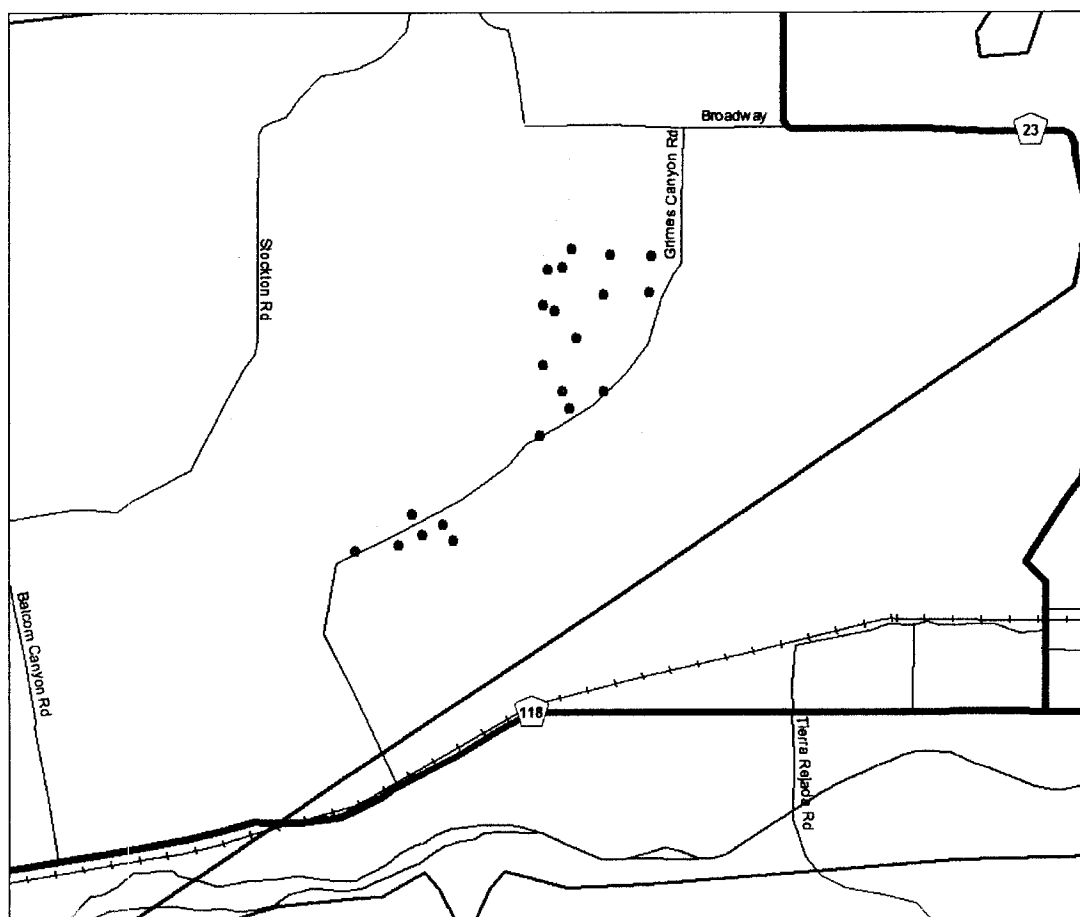


Figure C-1. Locations (indicated by orange circular areas) of monitoring to track the effects of ASR injection and pumping. Dots represent Calleguas MWD ASR wells.